

EXHIBIT E

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA**

Norfolk Division

ePLUS, INC.,)	
)	
)	Civil Action No. 2:09cv232
Plaintiff,)	
)	
v.)	
)	
PERFECT COMMERCE, INC.,)	
SCIQUEST, INC., LAWSON)	
SOFTWARE, INC. AND VERIAN)	
TECHNOLOGIES, INC.,)	
)	
Defendants.)	

**DEFENDANT LAWSON SOFTWARE, INC.'S SUPPLEMENTAL RESPONSES TO
PLAINTIFF ePLUS INC.'S INTERROGATORY NOS. 2, 4, and 10**

Pursuant to Rules 26(e) and 33 of the Federal Rules of Civil Procedure, Defendant Lawson Software, Inc., ("Lawson") hereby supplements its responses to Interrogatory Nos. 2, 4 and 10 from Plaintiff ePlus, Inc.'s ("ePlus") Second Set of Interrogatories (Nos. 15-21) as set forth below.

GENERAL OBJECTIONS

Lawson incorporates the General Objections set forth in its initial responses to Plaintiff's First Set of Interrogatories (Nos. 1-14).

Subject to those General Objections and the more specific objections set forth below, Lawson responds as follows.

INTERROGATORIES

INTERROGATORY NO. 2.

With respect to any of Lawson's Electronic Sourcing and Procurement System(s) and/or Service(s) and/or operations, using a claim chart, state in detail Lawson's bases for any assertions of non-infringement of each of the patents in suit on a claim-by-claim, element-by-element basis. Your answer should include a statement of Lawson's interpretation of each claim element (including whether the element should be interpreted under section 112, paragraph 6 and, if so, identifying the structure in the specification of the patent that corresponds to the recited element), a statement whether Lawson's Electronic Sourcing and Procurement System(s) and/or Services and/or operations provide(s) such an element or an equivalent and, if not, an explanation how Lawson's Electronic Sourcing and Procurement System(s) and/or Services and/or operations operate or function differently than the claim element and a particularized statement why a component, feature or function of Lawson's Electronic Sourcing and Procurement System(s) and/or Service(s) and/or operations is not a substantial equivalent of the pertinent claim element.

OBJECTION TO INTERROGATORY NO. 2:

Lawson objects to Interrogatory No.2 on all the grounds set forth in its General Objections and incorporates these objections as if set forth in full herein. Lawson further objects that this interrogatory is vague, ambiguous, unduly burdensome and compound. Lawson further objects to this interrogatory as overly broad to the extent it seeks proprietary and confidential information about Lawson's products that are neither relevant to the subject matter of this litigation nor likely to lead to the discovery of admissible evidence. Lawson further objects to this interrogatory to the extent it seeks information related to every customer installation of

Lawson software. Lawson further objects to this interrogatory as vague and ambiguous in its use of the term "Lawson's Electronic Sourcing and Procurement System(s) and/or Services and/or operations." Lawson further objects to this interrogatory as calling for a legal conclusion and premature as the Court has not yet construed the claims of the patents-in-suit and ePlus has not yet identified the asserted claims, accused products, and its specific infringement allegations pertaining thereto.

RESPONSE TO INTERROGATORY NO. 2:

Subject to and without waiving its objections, Lawson will supplement its response to this interrogatory and provide claim charts as necessary at the appropriate time, but not before ePlus specifically identifies the claims it asserts and the Lawson products it accuses of infringement.

SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 2:

Subject to and without waiving its objections, in general, Lawson's software products are sold to customers to allow those customers to track inventoried items and to procure inventory items as needed. Lawson's products operate on an item master, which is a database capable of receiving data relating to inventory items. As sold, Lawson's products include an empty item master. A customer can choose to load items to be tracked and inventoried by that customer into the item master as data records. The item master can be searched, as a whole, to find one or more data records that a customer might retrieve from the item master. The item master tracks vendors associated with the data records, but does not segregate records by vendor, allow searching based on a particular vendor, or determine equivalent or substitute products among vendors.

Lawson's Punchout software product allows customers to establish connections with

individual external vendor databases, separate from Lawson's item master. Customers can search these external databases for items, and add a selected item to a requisition. Lawson does not import the external vendor databases into the item master, or provide any automated comparison or conversion of items between external vendor databases and the item master.

In view of this brief description of Lawson's products, Lawson notes the following with respect to the claims of the '683 patent, the '516 patent, and the '172 patent (collectively "the patents-in-suit") and Lawson's Electronic Sourcing and Procurement System(s) and/or Services and/or operations as may be used by a customer, not necessarily as sold by Lawson (collectively "Lawson's accused products/services"), without prejudice to the burden of proof remaining on ePlus as to proving direct infringement by any customer or user, and further without prejudice to the burden of proof remaining on ePlus to show all facts necessary to prove indirect infringement by Lawson with respect to any purportedly infringing activities of its customers:

U.S. Patent No. 6,023,683 ("the '683 patent")

'683 Patent Claim Element	Lawson's Bases for Assertions of Noninfringement
1. An electronic sourcing system comprising:	
at least two product catalogs containing data relating to items associated with the respective sources;	Lawson's accused products/services lack two product catalogs, and lack data relating to items associated with respective sources. Generally, Lawson's products use an item list generated by customers, not catalogs.
means for selecting the product catalogs to search;	<p>This element should be construed under 35 U.S.C. § 112 ¶ 6. See Judge Spencer's SAP Markman decision for corresponding structure, although Lawson reserves the right upon further review to either assert no structure corresponds to this limitation or that different structure corresponds to this limitation.</p> <p>Lawson's accused products/services do not perform the function of selecting a product catalog to</p>

	<p>search.</p> <p>Lawson's accused products/services lack the structure disclosed in the '683 patent corresponding to this element, and are not equivalent thereto.</p>
means for searching for matching items among the selected product catalogs;	<p>This element should be construed under 35 U.S.C. § 112 ¶ 6. See Judge Spencer's SAP Markman decision for corresponding structure, although Lawson reserves the right upon further review to either assert no structure corresponds to this limitation or that different structure corresponds to this limitation.</p> <p>Lawson's accused products/services do not perform the function of searching for matching items among selected product catalogs, at least because they do not provide for selecting catalogs.</p> <p>Lawson's accused products/services lack the structure disclosed in the '683 patent corresponding to this element, and are not equivalent thereto.</p>
means for building a requisition using data relating to selected matching items and their associated source(s);	<p>This element should be construed under 35 U.S.C. § 112 ¶ 6. See Judge Spencer's SAP Markman decision for corresponding structure, although Lawson reserves the right upon further review to either assert no structure corresponds to this limitation or that different structure corresponds to this limitation.</p> <p>Lawson's accused products/services do not perform the function of building a requisition using data relating to selected matching items and their associated source(s), at least because Lawson's system does not have "selected matching items" as described above.</p> <p>Lawson's accused products/services lack the structure disclosed in the '683 patent corresponding to this element, and are not equivalent thereto.</p>
means for processing the requisition to generate one or more purchase orders for the selected matching items; and	<p>This element should be construed under 35 U.S.C. § 112 ¶ 6. See Judge Spencer's SAP Markman decision for corresponding structure, although Lawson reserves the right upon further review to</p>

	<p>either assert no structure corresponds to this limitation or that different structure corresponds to this limitation.</p> <p>Lawson's accused products/services do not do not perform the function of processing the requisition to generate one or more purchase orders for the selected matching items, at least because Lawson's system does not have "selected matching items" as described above.</p> <p>Lawson's accused products/services lack the structure disclosed in the '683 patent corresponding to this element, and are not equivalent thereto.</p>
means for determining whether a selected matching item is available in inventory.	<p>This element should be construed under 35 U.S.C. § 112 ¶ 6. See Judge Spencer's SAP Markman decision for corresponding structure, although Lawson reserves the right upon further review to either assert no structure corresponds to this limitation or that different structure corresponds to this limitation.</p> <p>Lawson's accused products/services do not perform the function of determining whether a selected matching item is available in inventory, at least because Lawson's systems do not have "selected matching items" as described above.</p> <p>Lawson's accused products/services lack the structure disclosed in the '683 patent corresponding to this element, and are not equivalent thereto.</p>
3. An electronic sourcing system comprising:	
at least two product catalogs containing data relating to items associated with the respective sources;	<p>Lawson's accused products/services lack two product catalogs, and lack data relating to items associated with respective sources. Generally, Lawson's products use an item list generated by customers, not catalogs.</p>
means for selecting the product catalogs to search;	<p>This element should be construed under 35 U.S.C. § 112 ¶ 6. See Judge Spencer's SAP Markman decision for corresponding structure, although Lawson reserves the right upon further review to</p>

	<p>either assert no structure corresponds to this limitation or that different structure corresponds to this limitation.</p> <p>Lawson's accused products/services do not perform the function of selecting product catalogs to search. Generally, Lawson's products use an item list, not catalogs.</p> <p>Lawson's accused products/services lack the structure disclosed in the '683 patent corresponding to this element, and are not equivalent thereto.</p>
means for searching for matching items among the selected product catalogs;	<p>This element should be construed under 35 U.S.C. § 112 ¶ 6. See Judge Spencer's SAP Markman decision for corresponding structure, although Lawson reserves the right upon further review to either assert no structure corresponds to this limitation or that different structure corresponds to this limitation.</p> <p>Lawson's accused products/services do not perform the function of searching for matching items among selected product catalogs. Generally, Lawson's products use an item list, not catalogs, and therefore do not perform the function of searching for matching items among selected product catalogs.</p> <p>Lawson's accused products/services lack the structure disclosed in the '683 patent corresponding to this element, and are not equivalent thereto.</p>
means for building a requisition using data relating to selected matching items and their associated source(s);	<p>This element should be construed under 35 U.S.C. § 112 ¶ 6. See Judge Spencer's SAP Markman decision for corresponding structure, although Lawson reserves the right upon further review to either assert no structure corresponds to this limitation or that different structure corresponds to this limitation.</p> <p>Lawson's accused products/services do not perform the function of building a requisition using data relating to selected matching items and their associated source(s), at least because the accused products/services do not obtain "selected matching items" as described above. Generally, Lawson's</p>

	<p>products use an item list, not catalogs.</p> <p>Lawson's accused products/services lack the structure disclosed in the '683 patent corresponding to this element, and are not equivalent thereto.</p>
means for processing the requisition to generate one or more purchase orders for the selected matching items; and	<p>This element should be construed under 35 U.S.C. § 112 ¶ 6. See Judge Spencer's SAP Markman decision for corresponding structure, although Lawson reserves the right upon further review to either assert no structure corresponds to this limitation or that different structure corresponds to this limitation.</p> <p>Lawson's accused products/services do not perform the function of processing the requisition to generate one or more purchase orders for the selected matching items, at least because the accused products/services do not obtain "selected matching items" as described above.</p> <p>Lawson's accused products/services lack the structure disclosed in the '683 patent corresponding to this element, and are not equivalent thereto.</p>
means for converting data related to a selected matching item and an associated source to data relating to an item and a different source.	<p>This element should be construed under 35 U.S.C. § 112 ¶ 6. See Judge Spencer's SAP Markman decision for corresponding structure, although Lawson reserves the right upon further review to either assert no structure corresponds to this limitation or that different structure corresponds to this limitation.</p> <p>Lawson's accused products/services do not perform the function of converting data related to a selected matching item and an associated source to data relating to an item and a different source, at least because the accused products/services do not convert data related to a selected matching item and do not obtain "selected matching items." as described above.</p> <p>Lawson's accused products/services lack the structure disclosed in the '683 patent corresponding to this element, and are not equivalent thereto.</p>

6. An electronic sourcing system comprising:	
a database containing data relating to items associated with at least two sources;	Lawson's accused products/services lack a database containing data relating to items associated with at least two sources. Customers populate the item list in the Lawson products as they wish, and Lawson does not induce or control the selection of items for customers' items lists to be associated with any particular number of sources.
means for searching for matching items in the database;	<p>This element should be construed under 35 U.S.C. § 112 ¶ 6. See Judge Spencer's SAP Markman decision for corresponding structure, although Lawson reserves the right upon further review to either assert no structure corresponds to this limitation or that different structure corresponds to this limitation.</p> <p>Lawson's accused products/services lack the structure disclosed in the '683 patent corresponding to this element, and are not equivalent thereto.</p>
means for building a requisition using data relating to selected matching items and their associated source(s);	<p>This element should be construed under 35 U.S.C. § 112 ¶ 6. See Judge Spencer's SAP Markman decision for corresponding structure, although Lawson reserves the right upon further review to either assert no structure corresponds to this limitation or that different structure corresponds to this limitation.</p> <p>Lawson's accused products/services lack the structure disclosed in the '683 patent corresponding to this element, and are not equivalent thereto.</p>
means for processing the requisition to generate one or more purchase orders for the selected matching items; and	<p>This element should be construed under 35 U.S.C. § 112 ¶ 6. See Judge Spencer's SAP Markman decision for corresponding structure, although Lawson reserves the right upon further review to either assert no structure corresponds to this limitation or that different structure corresponds to this limitation.</p> <p>Lawson's accused products/services lack the structure disclosed in the '683 patent corresponding</p>

	to this element, and are not equivalent thereto.
means for converting data relating to a selected matching item and an associated source to data relating to an item and a different source.	<p>This element should be construed under 35 U.S.C. § 112 ¶ 6. See Judge Spencer's SAP Markman decision for corresponding structure, although Lawson reserves the right upon further review to either assert no structure corresponds to this limitation or that different structure corresponds to this limitation.</p> <p>Lawson's accused products/services do not convert data relating to a selected matching item and an associated source to data relating to an item and a different source, at least because the accused products/services do not convert data related to a selected matching item.</p> <p>Lawson's accused products/services lack the structure disclosed in the '683 patent corresponding to this element, and are not equivalent thereto.</p>
11. An electronic sourcing system comprising:	
at least two product catalogs containing data relating to items associated with the respective sources;	Lawson's accused products/services lack two product catalogs containing data relating to items associated with respective sources. Generally, Lawson's products use an item list generated by customers, not catalogs.
means for searching for matching items among the matching catalogs;	<p>This element should be construed under 35 U.S.C. § 112 ¶ 6. See Judge Spencer's SAP Markman decision for corresponding structure, although Lawson reserves the right upon further review to either assert no structure corresponds to this limitation or that different structure corresponds to this limitation.</p> <p>Lawson's accused products/services do not search for matching items among matching catalogs. It is unclear what "the matching catalogs" are, but Lawson products do not use multiple catalogs. Nor do the Lawson products search for matching items among matching catalogs.</p> <p>Lawson's accused products/services lack the</p>

	structure disclosed in the '683 patent corresponding to this element, and are not equivalent thereto.
means for building a requisition that includes a first matching item and a second matching item, each associated with a different source;	<p>This element should be construed under 35 U.S.C. § 112 ¶ 6. See Judge Spencer's SAP Markman decision for corresponding structure, although Lawson reserves the right upon further review to either assert no structure corresponds to this limitation or that different structure corresponds to this limitation.</p> <p>Lawson's accused products/services do not perform the function of building a requisition that includes a first matching item and a second matching item, each associated with a different source, at least because they lack "matching items" from among matching catalogs.</p> <p>Lawson's accused products/services lack the structure disclosed in the '683 patent corresponding to this element, and are not equivalent thereto.</p>
means for processing the requisition to generate purchase orders for the first and second matching items; and	<p>This element should be construed under 35 U.S.C. § 112 ¶ 6. See Judge Spencer's SAP Markman decision for corresponding structure, although Lawson reserves the right upon further review to either assert no structure corresponds to this limitation or that different structure corresponds to this limitation.</p> <p>Lawson's accused products/services do not perform the function of processing the requisition to generate purchase orders for the first and second matching items, at least because they lack the function of creating the "requisition" from matching items from among matching catalogs as described above.</p> <p>Lawson's accused products/services lack the structure disclosed in the '683 patent corresponding to this element, and are not equivalent thereto.</p>
means for converting data relating to a selected matching item and an associated source to data relating to an item and a different source.	This element should be construed under 35 U.S.C. § 112 ¶ 6. See Judge Spencer's SAP Markman decision for corresponding structure, although Lawson reserves the right upon further review to

	<p>either assert no structure corresponds to this limitation or that different structure corresponds to this limitation.</p> <p>Lawson's accused products/services do not convert data relating to a selected matching item and an associated source to data relating to an item and a different source, at least because the accused products/services do not convert data related to a selected matching item and do not obtain "matching items" from among matching catalogs as described above.</p> <p>Lawson's accused products/services lack the structure disclosed in the '683 patent corresponding to this element, and are not equivalent thereto.</p>
14. An electronic sourcing system comprising:	
data relating to items associated with at least two sources maintained so that selected data may be searched separately;	<p>Lawson's accused products/services lack data relating to items associated with at least two sources, maintained so that selected data may be searched separately. It is unclear what "selected data" is, but generally, Lawson's products use an item list generated by customers, which is not maintained so that selected data may be searched separately. Customers populate the item list in the Lawson products as they wish, and Lawson does not induce or control the selection of items for customers' items lists to be associated with any particular number of sources. Lawson does not perform searching for customers.</p>
means for searching for matching items among the selected data;	<p>This element should be construed under 35 U.S.C. § 112 ¶ 6. See Judge Spencer's SAP Markman decision for corresponding structure, although Lawson reserves the right upon further review to either assert no structure corresponds to this limitation or that different structure corresponds to this limitation.</p> <p>Lawson's accused products/services do not search for matching items among selected data. It is unclear what "the selected data" is, but Lawson's products do not have the function of searching through subsets of data generally, nor do they</p>

	<p>perform the function of searching for matching items among selected data.</p> <p>Lawson's accused products/services lack the structure disclosed in the '683 patent corresponding to this element, and are not equivalent thereto.</p>
means for building a requisition using data relating to selected matching items and their associated source(s);	<p>This element should be construed under 35 U.S.C. § 112 ¶ 6. See Judge Spencer's SAP Markman decision for corresponding structure, although Lawson reserves the right upon further review to either assert no structure corresponds to this limitation or that different structure corresponds to this limitation.</p> <p>Lawson's accused products/services do not perform the function of building a requisition using data relating to selected matching items and their associated source(s), at least because the Lawson products do not create "matching items" from among selected data as described above.</p> <p>Lawson's accused products/services lack the structure disclosed in the '683 patent corresponding to this element, and are not equivalent thereto.</p>
means for processing the requisition to generate purchase orders using data relating to the selected matching items and their associated source(s); and	<p>This element should be construed under 35 U.S.C. § 112 ¶ 6. See Judge Spencer's SAP Markman decision for corresponding structure, although Lawson reserves the right upon further review to either assert no structure corresponds to this limitation or that different structure corresponds to this limitation.</p> <p>Lawson's accused products/services do not perform the function of processing the requisition to generate purchase orders using data relating to the selected matching items and their associated source(s), at least because the Lawson products do not create "matching items" from among selected data as described above.</p> <p>Lawson's accused products/services lack the structure disclosed in the '683 patent corresponding to this element, and are not equivalent thereto.</p>

means for converting data relating to a selected matching item and an associated source to data relating to an item and a different source.	<p>This element should be construed under 35 U.S.C. § 112 ¶ 6. See Judge Spencer's SAP Markman decision for corresponding structure, although Lawson reserves the right upon further review to either assert no structure corresponds to this limitation or that different structure corresponds to this limitation.</p> <p>Lawson's accused products/services do not perform the function of converting data relating to a selected matching item and an associated source to data relating to an item and a different source. Lawson products do not generate a selected matching item from among selected data, and do not convert data relating to one item to data relating to another item.</p> <p>Lawson's accused products/services lack the structure disclosed in the '683 patent corresponding to this element, and are not equivalent thereto.</p>
19. An electronic sourcing system comprising:	
a database containing data relating to items associated with at least two vendors maintained so that selected portions of the database may be searched separately;	<p>Lawson's accused products/services lack a database containing data relating to items associated with at least two vendors maintained so that selected portions of the database may be searched separately. Generally, Lawson's products use an item list generated by customers, which is not maintained so that selected portions may be searched separately. Customers populate the item list in the Lawson products as they wish, and Lawson does not induce or control the selection of items for customers' items lists to be associated with any particular number of vendors.</p>
means for searching for matching items in the selected portions of the database;	<p>This element should be construed under 35 U.S.C. § 112 ¶ 6. See Judge Spencer's SAP Markman decision for corresponding structure, although Lawson reserves the right upon further review to either assert no structure corresponds to this limitation or that different structure corresponds to this limitation.</p> <p>Lawson's accused products/services do not search</p>

	<p>for matching items in selected portions of a database. Lawson's products do not provide for searching portions of the database. Moreover, it is unclear what "the selected portions" is referring to.</p> <p>Lawson's accused products/services lack the structure disclosed in the '683 patent corresponding to this element, and are not equivalent thereto.</p>
means for building a requisition that includes data relating to selected matching items;	<p>This element should be construed under 35 U.S.C. § 112 ¶ 6. See Judge Spencer's SAP Markman decision for corresponding structure, although Lawson reserves the right upon further review to either assert no structure corresponds to this limitation or that different structure corresponds to this limitation.</p> <p>Lawson's accused products/services do not perform the function of building a requisition that includes data relating to selected matching items, at least because the Lawson products do not create "matching items" from selected portions of a database, as described above. Moreover, it is unclear what "selected matching items" refers to.</p> <p>Lawson's accused products/services lack the structure disclosed in the '683 patent corresponding to this element, and are not equivalent thereto.</p>
means for processing the requisition to generate purchase orders for selected matching items.	<p>This element should be construed under 35 U.S.C. § 112 ¶ 6. See Judge Spencer's SAP Markman decision for corresponding structure, although Lawson reserves the right upon further review to either assert no structure corresponds to this limitation or that different structure corresponds to this limitation.</p> <p>Lawson's accused products/services do not perform the function of processing the requisition to generate purchase orders for selected matching items, at least because the Lawson products do not create "matching items" from selected portions of a database, as described above.</p>

	Lawson's accused products/services lack the structure disclosed in the '683 patent corresponding to this element, and are not equivalent thereto.
26. A method comprising the steps of:	
maintaining at least two product catalogs on a database containing data relating to items associated with the respective sources;	<p>Lawson's accused products/services do not maintain at least two product catalogs on a database containing data relating to items associated with the respective sources, and thus this step is not performed in using the Lawson products/services.</p> <p>Generally, Lawson's products use an item list generated by customers. Customers populate the item list in the Lawson products as they wish, and Lawson does not induce or control the selection of items for customers' items lists to be associated with any particular number of sources.</p> <p>Additionally, Lawson, by manufacture or sale of its products, does not maintain at least two product catalogs on a database containing data relating to items associated with the respective sources. Lawson does not even maintain the item list for customers.</p>
selecting the product catalogs to search;	<p>Lawson's accused products/services do not select product catalogs to search. Lawson products/services do not provide for multiple catalogs, and thus this step is not performed in using the Lawson products/services.</p> <p>Additionally, Lawson, by manufacture or sale of its products, does not search.</p>
searching for matching items among the selected product catalogs;	<p>Lawson's accused products/services do not provide for searching for matching items among selected product catalogs. Lawson products do not provide for multiple product catalogs, and also do not provide for searching among selected product catalogs.</p> <p>Additionally, Lawson, by manufacture or sale of its products, does not search, and in particular does not search for matching items among selected product catalogs, and thus this step is not performed in using the Lawson products/services.</p>

building a requisition using data relating to selected matching items and their associated sources;	Lawson, by manufacture or sale of its products, does not build a requisition using data related to selected matching items and their associated sources. Moreover, Lawson products/services do not use data "relating to matching items" as Lawson does not search for items from selected product catalogs, as discussed above, and thus this step is not performed in using the Lawson products/services.
processing the requisition to generate one or more purchase orders for the selected matching items; and	Lawson, by manufacture or sale of its products, does not process a requisition to generate one or more purchase orders for selected matching items. Moreover, Lawson products/services do not create "selected matching items" as Lawson does not search for items from selected product catalogs, as discussed above, and thus this step is not performed in using the Lawson products/services.
determining whether a selected matching item is available in inventory.	Lawson, by manufacture or sale of its products, does not determine whether a selected matching item is available in inventory. Lawson products/services do not provide for "selected matching items," because Lawson does not search for items from selected product catalogs. Thus this step is not performed in using the Lawson products/services.
28. A method comprising the steps of:	
maintaining at least two product catalogs on a database containing data relating to items associated with the representative sources;	<p>Lawson's accused products/services do not maintain at least two products catalogs on a database containing data relating to items associated with the catalogs' representative sources.</p> <p>Generally, Lawson's products use an item list generated by customers. Customers populate the item list in the Lawson products as they wish, and Lawson does not induce or control the selection of items for customers' items lists to be associated with any particular number of sources. Lawson's products/services do not provide for multiple product catalogs relating to "representative sources."</p> <p>Lawson, by manufacture or sale of its products, does not maintain at least two products catalogs on a database containing data relating to items associated with the catalogs' representative sources.</p>

	Lawson does not even maintain the item list for customers.
selecting the product catalogs to search;	<p>Lawson's accused products/services do not allow selection of product catalogs to search. Lawson products/services do not provide for multiple catalogs, nor for selecting from multiple catalogs the catalogs to search.</p> <p>Additionally, Lawson, by manufacture or sale of its products, does not perform any searching.</p>
searching for matching items among the selected product catalogs;	<p>Lawson's accused products/services do not provide searching for matching items among selected product catalogs. Lawson products/services do not provide for multiple catalogs, and therefore cannot search for matching items from among selected catalogs.</p> <p>Additionally, Lawson, by manufacture or sale of its products, does not search, and in particular does not search for matching items among selected product catalogs.</p>
building a requisition using data relating to selected matching items and their associated source(s);	Lawson, by manufacture or sale of its products, does not build a requisition using data relating to selected matching items and their associated source(s). Lawson products/services do not provide for "selected matching items" from among selected product catalogs, as discussed above, and thus this step is not performed by customers.
processing the requisition to generate one or more purchase orders for the selected matching items; and	Lawson, by manufacture or sale of its products, does not process a requisition to generate one or more purchase orders for selected matching items. Lawson products/services do not provide for "selected matching items" from among selected product catalogs, as discussed above, and thus this step is not performed in using the Lawson products/services.
converting data relating to a selected matching item and an associated source to data relating to an item and a different source.	Lawson's accused products/services do not convert data relating to a selected matching item and associated source to data relating to an item and a different source; nor do Lawson products/services provide for "selected matching items" from among selected product catalogs, as discussed above, and thus this step is not performed in using the Lawson products/services. It is unclear what "a selected

	<p>matching item" is.</p> <p>Additionally, Lawson, by manufacture or sale of its products, does not convert data relating to a selected matching item and associated source to data relating to an item and a different source.</p>
31. A method comprising the steps of:	
maintaining a database containing data relating to items associated with at least two sources;	<p>Lawson's accused products/services do not maintain a database containing data relating to items associated with at least two sources. Generally, Lawson's products use an item list generated by customers. Customers populate the item list in the Lawson products as they wish, and Lawson does not induce or control the selection of items for customers' items lists to be associated with any particular number of sources.</p> <p>Additionally, Lawson, by manufacture or sale of its products, does not maintain a database containing data relating to items associated with at least two sources. Lawson does not even maintain the item list for customers.</p>
searching for matching items among the data relating to the items;	Lawson, by manufacture or sale of its products, does not search for matching items among the data relating to the items.
building a requisition using data relating to selected matching items and their associated sources;	Lawson, by manufacture or sale of its products, does not build a requisition using data relating to selected matching items and their associated sources.
processing the requisition to generate purchase orders using data relating to selected matching items and their associated source(s); and	Lawson, by manufacture or sale of its products, does not process a requisition to generate purchase orders using data relating to selected matching items and their associated sources.
converting data relating to a selected matching item and an associated source to data relating to an item and a different source.	<p>Lawson's accused products/services do not convert data relating to a selected matching item and an associated source to data relating to an item and a different source. It is unclear what "a selected matching item" is.</p> <p>Additionally, Lawson, by manufacture or sale of its products, does not convert data relating to a selected matching item and an associated source to data relating to an item and a different source.</p>
36. A method comprising the steps of:	

<p>maintaining a database containing at least two product catalogs containing data relating to items associated with the respective sources;</p>	<p>Lawson's accused products/services do not maintain a database containing at least two product catalogs containing data relating to items associated with the respective sources. Generally, Lawson's products use an item list generated by customers. Customers populate the item list in the Lawson products as they wish, and Lawson does not induce or control the selection of items for customers' items lists to be associated with any particular number of sources. Multiple catalogs are not provided for in the database.</p> <p>Additionally, Lawson, by manufacture or sale of its products, does not maintain a database containing at least two product catalogs containing data relating to items associated with the respective sources. Lawson does not even maintain the item list for customers.</p>
<p>searching for matching items among the product catalogs;</p>	<p>Lawson's accused products/services do not search for matching items among product catalogs, and thus this step is not performed in using the Lawson products/services.</p> <p>Additionally, Lawson, by manufacture or sale of its products, does not search for matching items among product catalogs.</p>
<p>building a requisition that includes a first matching item and a second matching item, each from a different product catalog;</p>	<p>Lawson's accused products/services do not build a requisition that includes a first matching item and a second matching item, each from a different product catalog. Lawson products/services do not provide for "a first matching item" and a "second matching item," each from a different catalog as the Lawson products/services maintain an item list rather than product catalogs. Thus this step is not performed in using the Lawson products/services.</p> <p>Additionally, Lawson, by manufacture or sale of its products, does not build a requisition that includes matching items from different product catalogs.</p>
<p>processing the requisition to generate purchase orders for the first and second matching items; and</p>	<p>Lawson, by manufacture or sale of its products, does not process a requisition to generate purchase orders for matching items. Lawson products/services do not provide for "matching items" from different product catalogs, as discussed above, and thus this step is not performed in using</p>

	the Lawson products/services.
converting data relating to a selected matching item and an associated source to data relating to an item and a different source.	<p>Lawson's accused products/services do not convert data relating to a selected matching item and an associated source to data relating to an item and a different source.</p> <p>Additionally, Lawson, by manufacture or sale of its products, does not convert data relating to a selected matching item and an associated source to data relating to an item and a different source. Nor do Lawson products/services provide for a "selected matching item" from a product catalog as discussed above, and thus this step is not performed in using the Lawson products/services. It is unclear what "a selected matching item" is.</p>
40. A method comprising the steps of:	
maintaining a database containing data relating to items associated with at least two sources whereby selected portions of the database may be searched separately;	<p>Lawson's accused products/services do not include data relating to items associated with at least two sources whereby selected portions of the database may be searched separately. Generally, Lawson's products use an item list generated by customers. Customers populate the item list in the Lawson products as they wish, and Lawson does not induce or control the selection of items for customers' items lists to be associated with any particular number of sources. Moreover, as Lawson's products/services do not provide for separate searching of portions of the database, customers would not perform this step.</p> <p>Additionally, Lawson, by manufacture or sale of its products, does not maintain a database containing data relating to items associated with at least two sources whereby selected portions of the database may be searched separately. Lawson does not even maintain the item list for customers.</p>
searching for matching items among the selected portions of the database;	<p>Lawson's accused products/services do not search for matching items among selected portions of a database, and thus this step is not performed in using the Lawson products/services.</p> <p>Additionally, Lawson, by manufacture or sale of its products, does not search for matching items among selected portions of a database</p>
building a requisition using data relating to	Lawson, by manufacture or sale of its products,

selected matching items and their associated source(s);	does not build a requisition using data relating to selected matching items and associated sources. Lawson products/services do not provide for "selected matching items" from among selected portions of a database, as discussed above, and thus this step is not performed in using the Lawson products/services.
processing the requisition to generate purchase orders using data relating to the selected matching items and their associated source(s); and	Lawson, by manufacture or sale of its products, does not process a requisition to generate purchase orders using data relating to the selected matching items and associated sources. Lawson products/services do not provide for "selected matching items" from among selected portions of a database, as discussed above, and thus this step is not performed in using the Lawson products/services.
determining whether the selected matching item is available in inventory.	Lawson, by manufacture or sale of its products, does not determine whether a selected matching item is available in inventory. Lawson products/services do not provide for "selected matching items" from among selected portions of a database, as discussed above, and thus this step is not performed in using the Lawson products/services.
41. A method comprising the steps of:	
maintaining a database containing data relating to items associated with at least two sources whereby selected portions of the database may be searched separately;	<p>Lawson's accused products/services do not maintain a database containing data relating to items associated with at least two sources whereby selected portions of the database may be searched separately. Generally, Lawson's products use an item list generated by customers. Customers populate the item list in the Lawson products as they wish, and Lawson does not induce or control the selection of items for customers' items lists to be associated with any particular number of sources. Moreover, as Lawson's products/services do not provide for separate searching of portions of the database, customers would not perform this step.</p> <p>Additionally, Lawson, by manufacture or sale of its products, does not maintain a database containing data relating to items associated with at least two sources whereby selected portions of the database may be searched separately.</p>

searching for matching items among selected portions of the database;	<p>Lawson's accused products/services do not search for matching items among selected portions of a database, and thus this step is not performed in using the Lawson products/services.</p> <p>Additionally, Lawson, by manufacture or sale of its products, does not search for matching items among selected portions of a database.</p>
building a requisition using data relating to selected matching items and their associated source(s);	<p>Lawson, by manufacture or sale of its products, does not build a requisition using data relating to selected matching items and associated sources. Lawson products/services do not provide for "selected matching items" from selected portions of a database, as discussed above, and thus this step is not performed in using the Lawson products/services.</p>
processing the requisition to generate purchase orders using data relating to the selected matching items and their associated source(s); and	<p>Lawson, by manufacture or sale of its products, does not process a requisition to generate purchase orders using data relating to the selected matching items and associated sources. Lawson products/services do not provide for "selected matching items" from selected portions of a database, as discussed above, and thus this step is not performed in using the Lawson products/services.</p>
converting data relating to a selected matching item and an associated source to data relating to an item and a different source.	<p>Lawson's accused products/services do not convert data relating to a selected matching item and an associated source to data relating to an item and a different source. Lawson products/services do not provide for "selected matching items" from selected portions of a database, as discussed above, and thus this step is not performed in using the Lawson products/services. It is unclear what a selected matching item is.</p> <p>Additionally, Lawson, by manufacture or sale of its products, does not convert data relating to a selected matching item and an associated source to data relating to an item and a different source.</p>
45. A method comprising the steps of:	
maintaining a database containing data relating to items associated with at least two vendors whereby selected portions of the database may be searched separately;	<p>Lawson's accused products/services do not maintain a database containing data relating to items associated with at least two vendors whereby selected portions of the database may be searched separately. Generally, Lawson's products use an</p>

	<p>item list generated by customers. Customers populate the item list in the Lawson products as they wish, and Lawson does not induce or control the selection of items for customers' items lists to be associated with any particular number of vendors. Moreover, as Lawson's products/services do not provide for separate searching of selected portions of the database, customers would not perform this step.</p> <p>Additionally, Lawson, by manufacture or sale of its products, does not maintain a database containing data relating to items associated with at least two vendors whereby selected portions of the database may be searched separately.</p>
searching for matching items in the selected portions of the database;	<p>Lawson's accused products/services do not search for matching items in selected portions of a database, and thus cannot search for "matching items". Therefore, this step is not performed in using the Lawson products/services.</p> <p>Additionally, Lawson, by manufacture or sale of its products, does not search for matching items in selected portions of a database.</p>
building a requisition that includes selected matching items;	<p>Lawson, by manufacture or sale of its products, does not build a requisition that includes selected matching items. Lawson products/services do not provide for "selected matching items" in selected portions of a database as discussed above, and thus this step is not performed in using the Lawson products/services.</p>
processing the requisition to generate purchase orders for selected matching items.	<p>Lawson, by manufacture or sale of its products, does not process a requisition to generate purchase orders for selected matching items. Lawson products/services do not provide for "selected matching items" in selected portions of a database as discussed above, and thus this step is not performed in using the Lawson products/services.</p>

In addition to the reasons set forth in the above chart, Lawson notes the following with respect to the '683 patent:

1. The dependent claims of the '683 patent are not infringed for at least the same reasons as the independent claims from which they depend.

2. Claims 2, 4-5, 7-10, 12-13, 15-18, and 20-25 are system claims, and each depends from system claims including structure to be construed under 35 U.S.C. § 112 ¶ 6. These dependent claims recite additional structure that might be construed under 35 U.S.C. § 112 ¶ 6; therefore, Lawson for this additional reserves the right to (1) assert that one or more elements of those claims should be so construed, and (2) assert additional bases for noninfringement of those claims.

3. Claims 27, 29-30, 32-35, 37-39, and 42-44 are method claims, and each depends from another method claim. Lawson, by manufacture or sale of its products, does not perform any step of the methods of these dependent claims. Lawson also reserves the right to assert additional bases for noninfringement of those claims.

4. In addition to the above, Lawson does not induce its customers or other persons or entities to infringe any of the claims of the '683 patent. Lawson customers create their own item lists. Lawson had no specific intent to cause any customer or third party to take any action which would infringe any claim of the ePlus patents.

5. By ePlus's admission, the invention claimed in the ePlus patents invokes an automated process. See, e.g., the following from ePlus' Statement of Patent Owner in the '683 reexamination, at page 8:

Thus, according to Mr. Momyer [a listed inventor on the '683 patent], the system had to have the capability to "pull a product off a catalog and automatically process that item through requisitioning through to a purchase order, and with no previous purchase history for that product." Excerpts of the Trial Transcript in *ePlus, Inc. v. SAP America, Inc. and SAP AG*, Civil Action No. 3:05cv281 (E.D.Va.) at 182:2-189:23 (Momyer Direct)

To the extent Lawson products are involved with performing many of the functions of

the means-plus-function claims of the '683 patent or the steps of the method claims of the '683 patent, many such steps are not performed by such an automated process.

U.S. Patent No. 6,055,516 ("the '516 patent")

'516 Patent Claim Element	Lawson's Bases for Assertions of Noninfringement
1. An electronic sourcing system comprising:	
a collection of catalogs of items stored in an electronic format;	Lawson's accused products/services as sold and as used by customers do not include a collection of catalogs of items stored in an electronic format. Generally, Lawson's products use an item list generated by customers, not catalogs. There is no collection of catalogs.
a first set of predetermined criteria associated with said collection of catalogs;	Lawson's accused products/services as sold and used by customers lack a set of criteria associated with a collection of catalogs, as there is no collection of catalogs there is no need for criteria associated with a collection of catalogs.
a second set of predetermined criteria associated with items from each of said catalogs;	Lawson's accused products/services as sold and used by customers lack a set of predetermined criteria associated with a collection of catalogs, as there is no collection of catalogs.
a catalog selection protocol, said catalog selection protocol relying on said first set of predetermined criteria to select less than said entire collection of catalogs,	Lawson's accused products/services as sold and used by customers do not include a catalog selection protocol that relies on a set of criteria to select less than an entire collection of catalogs, as there is no collection of catalogs there is no purpose to a protocol which would select less than all of a collection of catalogs.
and including matching a vendor identification code with a subset of said collection of catalogs,	Lawson's accused products/services as sold and used by customers do not include functionality to match a vendor identification code with a subset of a collection of catalogs, as there is no collection of catalogs there is no subset of catalogs and no purpose to a matching a vendor code to a subset of a collection of catalogs.
wherein said subset of catalogs includes both a vendor catalog from a predetermined vendor and a second catalog from a predetermined third party that is one of a manufacturer and a competing vendor, said predetermined third party selling items corresponding to items in said vendor	Lawson's accused products/services as sold and used by customers do not include a subset of catalogs that includes a vendor catalog from a predetermined vendor and a second catalog from a predetermined third party that is one of a manufacturer and a competing vendor, and that is selling items corresponding to items in the vendor

catalog; and	catalog, as there are not multiple catalogs there is no subset of catalogs that can be made, let alone one with the described characteristics.
a search program, said search program relying on said second set of criteria to select specific items from said catalogs determined from said catalog selection protocol.	Lawson's accused products/services do not include a search program that searches catalogs determined from a catalog selection protocol. As stated above there are no multiple catalogs and no catalog selection protocol, and therefore no searching can select items from multiple catalogs determined from such a catalog selection protocol.
9. An electronic sourcing system comprising:	
a collection of catalog items stored in an electronic format;	Lawson's accused products/services as sold and as used by customers do not include a collection of catalogs of items stored in an electronic format. Generally, Lawson's products use an item list generated by customers, not catalogs. There is no collection of catalogs.
a first identification code associated with a first item in a first catalog;	Lawson's accused products/services do not include, as sold, a first item in a first catalog.
a second identification code associated with a second item in a second catalog, said first item and said second item being generally equivalent, and	Lawson's accused products/services do not include, as sold, a second item in a second catalog. Generally, Lawson's products/services as sold and used by customers use an item list generated by customers, not catalogs. There are no first and second catalogs. Moreover, Lawson does not determine what if any item might be equivalent to another item.
wherein a selection of one identification code from one of said first and second catalogs provides the other identification code from the other of said catalogs.	Lawson's accused products/services do not provide for selection of one identification code from one of a number of catalogs to provide a different identification code from a different catalog. Lawson's products/services as sold and used by customers lack multiple catalogs, and thus lack providing a code from one catalog due to selection of a code from another catalog. Moreover it is unclear how selection of a code would "provide" another code.
16. An electronic sourcing system comprising:	
at least two product catalogs containing data relating to items such that an item in a first catalog is generally equivalent with an item in a second catalog; and	Lawson's accused products/services do not provide at least two product catalogs including data relating to items, and do not provide items in first and second catalogs that are generally equivalent.

	Generally, Lawson's products/services as sold and used by customers use an item list generated by customers, not catalogs. There are no first and second catalogs. Moreover, Lawson does not determine what if any item might be equivalent to another item. It is unclear how the system claimed provides equivalents.
converting means for converting data relating to said item from said first catalog to data relating to said item from said second catalog.	<p>This element should be construed under 35 U.S.C. § 112 ¶ 6. See Judge Spencer's SAP Markman decision for corresponding structure, although Lawson reserves the right upon further review to either assert no structure corresponds to this limitation or that different structure corresponds to this limitation.</p> <p>Lawson's accused products/services do not perform the function of converting data related to an item from a first catalog to data relating to an item from a second catalog, both because Lawson's products lack catalogs and because no such conversion functionality exists in Lawson's accused products/services.</p> <p>Lawson's accused products/services lack the structure disclosed in the '516 patent corresponding to this element, and are not equivalent thereto.</p>
21. An electronic sourcing system comprising:	
a requisition module including data fields, user-generated criteria entered into at least one of said data fields to generate at least partial criteria corresponding to a desired item;	
a catalog collection searching module, said searching module including a collection of catalogs of items stored in an electronic format, a catalog selection criteria used to select less than said entire collection,	Lawson's accused products/services do not include a collection of catalogs of items stored in an electronic format. Generally, Lawson's products/services as sold and used by customers use an item list generated by customers, not catalogs. There is no collection of catalogs, and no need for a selection criteria to select less than an entire collection.
said searching module being used to generate additional search –module criteria	As there is no "said searching module," as shown above, this limitation is also missing.

for said data fields of said requisition module;	
a multiple purchase order generation module, said purchase order generation module creating multiple purchase orders from a single requisition created with said user-generated criteria and said search-module criteria;	The Lawson products/services as sold and used by customers lack the "search-module criteria" as explained above, and thus there is no requisition created with such criteria as required by this limitation.
wherein each of at least two catalogs include a generally equivalent item from a different source, said requisition module working in combination with said catalog searching module to determine multiple sources for said item;	Lawson's accused products/services do not include at least two catalogs that include a generally equivalent item from a different source, or a requisition module working in combination with a catalog searching module to determine multiple sources for an item. Lawson's products/services as sold and used by customers use an item list generated by customers, not catalogs. There is no multiple number of catalogs. Nor do the Lawson products/services provide equivalent items. Nor is there a catalog searching module that exists, and thus no module to work in combination with a requisition module.
wherein said multiple sources is limited by said catalog searching module providing a match according to said user-generated criteria, said search-module criteria and a determination system that located items are generally equivalent; and	Lawson's accused products/services do not include user-generated criteria that limit multiple sources, and does not determine that located items are generally equivalent. Nor is there a catalog searching module that exists, and thus no module to limit sources or provide a match. Nor is there a system that determines equivalence. This clause is unclear.
wherein said determination system includes a cross reference table matching an identification code from a first located item with a second identification code from a second located item.	Lawson's accused products/services do not include a determination system that includes such a cross reference table. Lawson's products/services do not provide for multiple catalogs and thus there are no such "first located item" and "second located item," and such items thus cannot be matched on a cross reference table.
29. An electronic sourcing system comprising:	
a collection of catalogs of items stored in an electronic format;	Lawson's accused products/services as sold and as used by customers do not include a collection of catalogs of items stored in an electronic format. Generally, Lawson's products use an item list generated by customers, not catalogs. There is no collection of catalogs.
a first set of pre-determined criteria	Lawson's accused products/services as sold and

associated with said collection of catalogs;	used by customers lack a set of criteria associated with a collection of catalogs, as there is no collection of catalogs there is no need for criteria associated with a collection of catalogs.
a second set of predetermined criteria associated with items from each of said catalogs;	Lawson's accused products/services as sold and used by customers lack a set of predetermined criteria associated with a collection of catalogs, as there is no collection of catalogs.
a catalog selection protocol, said catalog selection protocol relying on said first set of predetermined criteria to select less than said entire collection of catalogs,	Lawson's accused products/services as sold and used by customers do not include a catalog selection protocol that relies on a set of criteria to select less than an entire collection of catalogs, as there is no collection of catalogs there is no purpose to a protocol which would select less than all of a collection of catalogs.
and including matching a vendor identification code with a subset of said collection of catalogs,	Lawson's accused products/services as sold and used by customers do not include functionality to match a vendor identification code with a subset of a collection of catalogs, as there is no collection of catalogs there is no subset of catalogs and no purpose to a matching a vendor code to a subset of a collection of catalogs.
wherein said subset of catalogs includes both a vendor catalog from a predetermined vendor and a second catalog from a predetermined third party;	Lawson's accused products/services as sold and used by customers do not include a subset of catalogs that includes a vendor catalog from a predetermined vendor and a second catalog from a predetermined third party, as there are not multiple catalogs there is no subset of catalogs that can be made, let alone one with the described characteristics.
a search program, said search program relying on said second set of criteria to select specific items from said catalogs determined from said catalog selection protocol; and	Lawson's accused products/services do not include a search program that searches catalogs determined from a catalog selection protocol. As stated above there are no multiple catalogs and no catalog selection protocol, and therefore no searching can select items from multiple catalogs determined from such a catalog selection protocol.
a cross-reference table linking a vendor item catalog number from said vendor catalog with an item catalog number from said predetermined third party.	Lawson's accused products/services do not include a cross-reference table linking a vendor item catalog number from a vendor catalog with an item catalog number from a third party. The referenced vendor catalog and vendor and third party item catalog numbers are recited above as included within a subset of multiple catalogs. As there is no set of multiple catalogs, there is no subset that contains the recited catalogs and item numbers,

	and thus no cross-reference table can link such numbers.
--	--

In addition to the reasons set forth in the above chart, Lawson notes that claims 2-8, 10-15, 17-20, and 22-28 of the '172 patent are not infringed for at least the same reasons as the independent claims from which they depend.

One or more dependent claims may include clauses that are to be construed under 35 U.S.C. § 112 ¶ 6. These dependent claims recite additional structure that might be construed under 35 U.S.C. § 112 ¶ 6; therefore, Lawson for this additional reserves the right to (1) assert that one or more elements of those claims should be so construed, and (2) assert additional bases for noninfringement of those claims.

Lawson does not induce its customers or other persons or entities to infringe any of the claims of the '516 patent. Lawson customers create their own item lists. Lawson had no specific intent to cause any customer or third party to take any action which would infringe any claim of the ePlus patents.

By ePlus's admission, the invention claimed in the ePlus patents invokes an automated process. See, e.g., the following from ePlus' Statement of Patent Owner in the '683 reexamination, at page 8:

Thus, according to Mr. Momyer [a listed inventor on the '516 patent], the system had to have the capability to "pull a product off a catalog and automatically process that item through requisitioning through to a purchase order, and with no previous purchase history for that product." Excerpts of the Trial Transcript in *ePlus, Inc. v. SAP America, Inc. and SAP AG*, Civil Action No. 3:05cv281 (E.D.Va.) at 182:2-189:23 (Momyer Direct)

To the extent Lawson products are involved with performing many of the functions of the claims of the '516 patent or the steps of the method claims of the '516 patent, many such steps are not performed by such an automated process.

There may be additional reasons why these claims are not infringed, and Lawson reserves the right to supplement its bases for noninfringement of these dependent claims in the future.

U.S. Patent No. 6,505,172 ("the '172 patent")

'683 Patent Claim Element	Lawson's Bases for Assertions of Noninfringement
1. An electronic sourcing system comprising:	
a database containing data relating to items associated with at least two vendors maintained so that selected portions of the database may be searched separately;	Lawson's accused products/services lack a database containing data relating to items associated with at least two vendors maintained so that selected portions of the database may be searched separately. Whether a customer may create a database associated with multiple vendors is up to the customer, but in any event the system does not provide for search selected portions separately.
means for entering product information that at least partially describes at least one desired item;	<p>This element should be construed under 35 U.S.C. § 112 ¶ 6. See Judge Spencer's SAP Markman decision for corresponding structure, although Lawson reserves the right upon further review to either assert no structure corresponds to this limitation or that different structure corresponds to this limitation.</p> <p>Lawson's accused products/services lack the structure disclosed in the '172 patent corresponding to this element, and are not equivalent thereto.</p>
means for searching for matching items that match the entered product information in the selected portions of the database;	<p>This element should be construed under 35 U.S.C. § 112 ¶ 6. See Judge Spencer's SAP Markman decision for corresponding structure, although Lawson reserves the right upon further review to either assert no structure corresponds to this limitation or that different structure corresponds to this limitation.</p> <p>Lawson's accused products/services do not perform the function of searching for matching items that match the entered product information in selected portions of a database.</p>

	<p>Lawson's accused products/services lack the structure disclosed in the '172 patent corresponding to this element, and are not equivalent thereto.</p>
<p>means for generating an order list that includes at least one matching item selected by said means for searching;</p>	<p>This element should be construed under 35 U.S.C. § 112 ¶ 6. See Judge Spencer's SAP Markman decision for corresponding structure, although Lawson reserves the right upon further review to either assert no structure corresponds to this limitation or that different structure corresponds to this limitation.</p> <p>Lawson's accused products/services do not perform this function, as there is no "matching item" from a selected portion of the database as described above and no "means for searching" as described above.</p> <p>Lawson's accused products/services lack the structure disclosed in the '172 patent corresponding to this element, and are not equivalent thereto.</p>
<p>means for building a requisition that uses data obtained from said database relating to selected matching items on said order list;</p>	<p>This element should be construed under 35 U.S.C. § 112 ¶ 6. See Judge Spencer's SAP Markman decision for corresponding structure, although Lawson reserves the right upon further review to either assert no structure corresponds to this limitation or that different structure corresponds to this limitation.</p> <p>Lawson's accused products/services do not perform the function of building a requisition that uses data obtained from said database relating to selected matching items on said order list. As described above there is no "order list" as claimed, no "selected matching items" from a selected portion of the database as claimed, and no "database" as claimed, thus this function cannot be performed as recited.</p> <p>Lawson's accused products/services lack the structure disclosed in the '172 patent corresponding to this element, and are not equivalent thereto.</p>

means for processing said requisition to generate purchase orders for said selected matching items.	<p>This element should be construed under 35 U.S.C. § 112 ¶ 6. See Judge Spencer's SAP Markman decision for corresponding structure, although Lawson reserves the right upon further review to either assert no structure corresponds to this limitation or that different structure corresponds to this limitation.</p> <p>Lawson's accused products/services do not perform the function of processing said requisition to generate purchase orders for said selected matching items. As shown above there is no "said requisition" as claimed and no "selected matching items" from a selected portion of the database; thus this function cannot be performed as recited.</p> <p>Lawson's accused products/services lack the structure disclosed in the '172 patent corresponding to this element, and are not equivalent thereto.</p>

In addition to the reasons set forth in the above chart, Lawson notes the following with respect to the '172 patent:

1. Dependent claims 2-5 of the '172 patent are not infringed for at least the same reasons as the independent claims from which they depend. There may be additional reasons why these claims are not infringed, and Lawson reserves the right to supplement its bases for noninfringement of these dependent claims in the future.

2. Claims 2-5 are system claims, and each depends from claim 1 which includes structure to be construed under 35 U.S.C. § 112 ¶ 6. These dependent claims recite additional structure that might be construed under 35 U.S.C. § 112 ¶ 6; therefore, Lawson reserves the right to (1) assert that one or more elements of those claims should be so construed, and (2) assert

additional bases for noninfringement of those claims.

3. Lawson does not induce its customers or other persons or entities to infringe any of the claims of the '172 patent. Lawson customers create their own item lists. Lawson had no specific intent to cause any customer or third party to take any action which would infringe any claim of the ePlus patents.

4. By ePlus's admission, the invention claimed in the ePlus patents invokes an automated process. See, e.g., the following from ePlus' Statement of Patent Owner in the '683 reexamination, at page 8:

Thus, according to Mr. Momyer [a listed inventor on the '516 patent], the system had to have the capability to "pull a product off a catalog and automatically process that item through requisitioning through to a purchase order, and with no previous purchase history for that product." Excerpts of the Trial Transcript in *ePlus, Inc. v. SAP America, Inc. and SAP AG*, Civil Action No. 3:05cv281 (E.D.Va.) at 182:2-189:23 (Momyer Direct) . . .

To the extent Lawson products are involved with performing many of the functions of the claims of the '172 patent, many such functions are not performed by such an automated process.

With respect to all of the claims of the patents-in-suit, Lawson reserves the right to supplement its response to this interrogatory and provide additional details regarding its understanding of the meaning of various terms of the claims in the '683, '516, and '172 patents upon determination of which claims are asserted by ePlus, as well as upon construction of terms by the court. Lawson notes that certain terms have been construed in past litigations (i.e., *ePlus v. Ariba*; *ePlus v. SAP*); these constructions have been considered by Lawson as illustrative in developing its response to this interrogatory.

INTERROGATORY NO. 4:

State in detail all facts and contentions that support or refute Lawson's allegations, if any,

that any of the patents in suit are invalid under 35 U.S.C. §§ 102 or 103, identifying all prior patents, literature, publications, systems, processes, or devices, including prior knowledge, public uses, sales and offers for sale, that Lawson contends, either alone or in combination, invalidate one or more claims of any of the patents in suit, through a claim chart that identifies each element of each claim of the patent(s) asserted to be invalid and explains where each element of the respective claim is shown in such prior patent, literature, publications, system, process, device, public use, sale, or offer for sale.

OBJECTION TO INTERROGATORY NO. 4:

Lawson objects to Interrogatory No. 4 on all the grounds set forth in its General Objections and incorporates these objections as if set forth in full herein. Lawson further objects that this interrogatory is vague, ambiguous, unduly burdensome and compound. Lawson further objects to this interrogatory as a premature contention interrogatory, and an improper attempt to take expert discovery.

RESPONSE TO INTERROGATORY NO. 4:

Subject to and without waiving its objections, Lawson responds that the patents-in-suit are either anticipated or rendered obvious by at least one or more of the following prior art references and systems:

U.S. Patent No. 5,319,542
 U.S. Patent No. 5,694,551
 U.S. Patent No. 6,712,989 [sic] [U.S. Patent No. 5,712,989]
 U.S. Patent No. 5,361,199
 U.S. Patent No. 5,666,493
 U.S. Patent No. 4,992,940
 U.S. Patent No. 5,402,336
 TV12 General Information Manual
 The Electronic Catalog Market: Status and Directions, (c) 1994 by INPUT
 Electronic Commerce: Comprehensive Market Assessment, (c) 1992 by INPUT
 J-CON
 SABRE

P.O. Writer
GATEWAY /2000 or GATEWAY/DOS
Lawson Software
R/2
R/3
Movex
Mapics
REALITY
RIMS
TV/2
Nova DOS
Matkon
APS DOS
Condor
CARMS
Triad (CCI)
PMX-2
FAST
Palmas Purchasing+
EZMRP
PurchasePro
StockPro
ASAP (Baxter)
COACT+ (J&J)
SPEC 2000
IDB 2000
APOLLO

In addition, Lawson believes that relevant prior art exists at the following companies:

International Business Machines Corporation
Lockheed Martin Corporation
McKesson Corporation

In addition, for additional information responsive to this interrogatory, ePlus may refer to documents produced by Lawson relating to Reexamination Control Nos. 90/008,104 and 95/000,487.

Lawson reserves the right to supplement its response to this interrogatory, where appropriate, in accordance with its continuing investigation into these matters.

SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 4:

Lawson incorporates into this response as if fully provided herein the facts and contentions in the Request for *Ex Parte* Reexamination of the '683 patent and the Request for *Ex Parte* Reexamination of the '172 patent. Lawson contends that the facts and contentions in the Request for *Ex Parte* Reexamination of the '683 patent relating to claims 26-45, which are method claims, apply equally to claims 1-25, which are directed to a device for carrying out the method of claims 26-45. Furthermore, the facts and contention in both the Request for *Ex Parte* Reexamination of the '683 patent and the Request for *Ex Parte* Reexamination of the '172 patent apply equally to the claims of the '516 patent to the extent that claim elements similar to the claim elements of the '516 patent appear in the '683 patent, the '172 patent, or both.

Additionally, although the facts and contention in both the Request for *Ex Parte* Reexamination of the '683 patent and the Request for *Ex Parte* Reexamination of the '172 patent relate only to printed publications, Lawson will rely also on the actual product described in those printed publications. Based on the facts and contentions in the Request for *Ex Parte* Reexamination of the '683 patent, the Request for *Ex Parte* Reexamination of the '172 patent, or both, ePlus' asserted patents are invalid under 35 U.S.C. § 102 and/or § 103, including but not limited to 35 U.S.C. § 102 (a), (b), (e)(1) and (g)(2), and 35 U.S.C. § 103(a).

In addition to the facts and contentions in the Request for *Ex Parte* Reexamination of the '683 patent and the Request for *Ex Parte* Reexamination of the '172 patent, Lawson further contends that all three patents-in-suit are invalid under 35 U.S.C. § 102 and/or § 103, including but not limited to 35 U.S.C. § 102 (a), (b), (e)(1) and g(2), and 35 U.S.C. § 103(a), based on the P.O. Writer, U.S. Patent No. 5,694,551, U.S. Patent No. 5,712,989, and combinations thereof. Claim charts attached hereto as Appendix A detail where the elements of the asserted patent

claims are disclosed in these three prior art references.

Lawson reserves the right to supplement its response to this interrogatory, where appropriate, in accordance with its continuing investigation into these matters.

INTERROGATORY NO. 10:

Identify any and all revenues, the sources thereof and the number of transactions derived by Lawson in connection with its Electronic Sourcing and Procurement System(s) and/or Service(s) (including without limitation revenues derived from licensing, maintaining, or servicing such system(s), for each month from its inception of operations to the present, including, without limitation, the names of any clients or advertisers, the total revenue derived from each and the rates charged, the numbers of transactions, and the amounts derived from any licensing fees, and transaction-based fees collected in connection with its Electronic Sourcing and Procurement System(s) and/or Service(s).

OBJECTION TO INTERROGATORY NO. 10:

Lawson objects to Interrogatory No. 10 on all the grounds set forth in its General Objections and incorporates these objections as if set forth in full herein. Lawson further objects that this interrogatory is overly broad, vague, ambiguous, unduly burdensome and compound. Lawson further objects to this interrogatory to the extent it seeks proprietary and confidential information about Lawson's products that are neither relevant to the subject matter of this litigation nor likely to lead to the discovery of admissible evidence. Lawson further objects to this interrogatory as vague and ambiguous in its use of the terms "from its inception of operations," and "transaction-based fees."

RESPONSE TO INTERROGATORY NO. 10:

Subject to and without waiving its objections, once ePlus specifically identifies the

accused products, Lawson may produce documents pursuant to Federal Rule of Civil Procedure 33(d) from which ePlus may derive an answer to this interrogatory. In addition, ePlus has set forth numerous requests for production of documents addressing this issue. Accordingly, for additional information responsive to this interrogatory, ePlus may refer to the documents produced by Lawson in response to ePlus's document requests.

Lawson reserves the right to supplement its response to this interrogatory, where appropriate, in accordance with its continuing investigation into these matters.

SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 10:

Lawson identifies the following documents by Bates number as having responsive information: L0013533-34; L0013561; L0018226-28; L0018231-32; L0018530-35; L0018621-29; L0018693-98; L0019089-91; L0019373; L0019637; L0019648; L0019649; L0019674; L0020042-48; L0020849-59; L0020974-80; L0021672-75.

Lawson reserves the right to supplement its response to this interrogatory, where appropriate, in accordance with its continuing investigation into these matters.

AS TO OBJECTIONS

Dated: September 18, 2009

LAWSON SOFTWARE, INC.



Daniel McDonald, *pro hac vice*
William D. Schultz, *pro hac vice*
Rachel C. Hughey, *pro hac vice*
Joshua P. Graham, *pro hac vice*
Andrew Lagatta, *pro hac vice*
Merchant & Gould
3200 IDS Center
80 South Eighth Street
Minneapolis, MN 55402
Telephone: (612) 332-5300
Facsimile: 612) 332-9081
dmcDonald@merchantgould.com

wschultz@merchantgould.com
rhughey@merchantgould.com
jgraham@merchantgould.com
alagatta@merchantgould.com

Stephen E. Noona
(VSB No.25367)
Kaufman & Canoles, P.C.
150 West Main Street, Suite 2100
Norfolk, VA 23510
Telephone:(757) 624-3000
Facsimile: (757) 624-3169
senoona@kaufcan.com

*Counsel for Defendant Lawson Software,
Inc.*

APPENDIX A**U.S. Patent No. 6,023,683**

'683 Patent Claim Element	Disclosure of this Element in the Prior Art (page, column and line references are illustrative only and not comprehensive)
1. An electronic sourcing system comprising:	
at least two product catalogs containing data relating to items associated with the respective sources;	<p><u>P.O. WRITER</u> As items are added to the Item Master Record, they can be assigned to a particular catalog associated with a particular vendor. (SAP_0803520.) A particular catalog can be selected for searching by entering a CATALOGUE ID. (SAP_0803522-23.) The system may contain multiple CATALOGUE ID'S. (SAP_083522.)</p> <p><u>U.S. Patent No. 5,694,551</u> The master vendor catalog is assembled from information provided by individual vendors. (col. 8, ll. 47-60.)</p> <p><u>U.S. Patent No. 5,712,989</u> The inventory database includes data describing items available at various Distributor warehouses and for items from multiple vendors and third-party suppliers. (col. 3, ll. 18-21, 62-65; Fig. 1.)</p>
means for selecting the product catalogs to search;	<p><u>P.O. WRITER</u> A particular catalog can be selected for searching by entering a CATALOGUE ID. (SAP_0803522-23.)</p> <p><u>U.S. Patent No. 5,694,551</u> The customer initially selects the items to be available for searching using data files on vendor items. (col. 9, ll. 1-5.)</p>

'683 Patent Claim Element	Disclosure of this Element in the Prior Art (page, column and line references are illustrative only and not comprehensive)
	<p><u>U.S. Patent No. 5,712,989</u> A code may be included that limits item searches to particular Distributor warehouses. (col. 22, ll. 36-47.)</p>
means for searching for matching items among the selected product catalogs;	<p><u>P.O. WRITER</u> The selected catalogs can be searched by ITEM NUMBER, ITEM DESCRIPTION, COMMODITY CODE, or a portion of these criteria. (SAP_0803523-24.)</p> <p><u>U.S. Patent No. 5,694,551</u> The customer catalog may be searched by product group or keyword. (col. 5, 26-27.)</p> <p><u>U.S. Patent No. 5,712,989</u> Items may be searched for by catalog or reference number from a third-party vendor. (col. 8, ll. 25-46.) A code may be included that limits item searches to particular Distributor warehouses. (col. 22, ll. 36-47.)</p>
means for building a requisition using data relating to selected matching items and their associated source(s);	<p><u>P.O. WRITER</u> Items from the catalog screen can be selected for requisition by pressing F7. (SAP_0803526.)</p> <p><u>U.S. Patent No. 5,694,551</u> Quantity item ordering data can be entered directly onto the catalog screen and linked to the requisition screen. (col. 5, ll. 26-37.)</p> <p><u>U.S. Patent No. 5,712,989</u> Items entered by catalog or reference number are added to a Requisition Item table. (col. 8, ll. 40-46.)</p>
means for processing the	<u>P.O. WRITER</u>

'683 Patent Claim Element	Disclosure of this Element in the Prior Art (page, column and line references are illustrative only and not comprehensive)
requisition to generate one or more purchase orders for the selected matching items; and	<p>A purchase order can be created from the requisition list by pressing F4. (SAP_0803528.) Requisitions including items purchased from different vendors are split into different purchase orders by vendor. (SAP_0804199.)</p> <p><u>U.S. Patent No. 5,694,551</u> Requisitions are segregated by supplier and sent as purchase orders to appropriate internal suppliers and outside vendors. (Abstract; col. 4, ll. 4-17.)</p> <p><u>U.S. Patent No. 5,712,989</u> The Distributor will create an order for items it does not regularly stock. (col. 5, ll. 37-48; col. 10, l. 64 – col. 11, l. 8.) Multiple orders are generated depending on product type. (col. 11, ll. 37-47; col. 16 ll. 30-36.)</p>
means for determining whether a selected matching item is available in inventory.	<p><u>P.O. WRITER</u> An inventory Control Module allows you to track on-hand inventory balances. (SAP_0802953.)</p> <p><u>U.S. Patent No. 5,694,551</u> The requisition status information retrieves information on items in a particular requisition, including whether an item is backordered. (col. 5, ll. 42-48; Fig. 11.)</p> <p><u>U.S. Patent No. 5,712,989</u> A code may be included that limits item searches to particular Distributor warehouses and backordered if the item is not found. (col. 22, ll. 36-47.)</p>
2. The electronic sourcing system of claim 1 wherein the purchase orders include data relating to a catalog number for the selected item.	<p><u>P.O. WRITER</u> When an item is saved to the Item Master Record, it is associated with an ITEM NUMBER (SAP_0803304) and a CATALOGUE ID (SAP_0803520). The ITEM NUMBER is included on the final purchase order. (SAP_0803333.)</p>

'683 Patent Claim Element	Disclosure of this Element in the Prior Art (page, column and line references are illustrative only and not comprehensive)
	<p><u>U.S. Patent No. 5,694,551</u> Requisitions are segregated by supplier and sent as purchase orders to appropriate internal suppliers and outside vendors. (Abstract; col. 4, ll. 4-17.)</p> <p><u>U.S. Patent No. 5,712,989</u> The Distributor will create an order for items it does not regularly stock. (col. 5, ll. 37-48; col. 10, l. 64 – col. 11, l. 8.) Multiple orders are generated depending on product type. (col. 11, ll. 37-47; col. 16 ll. 30-36.) The Part Master records include a manufacturer or supplier's catalog or part number, which is used on the purchase order. (col. 8, ll. 32-34.)</p>
3. An electronic sourcing system comprising:	
at least two product catalogs containing data relating to items associated with the respective sources;	<p><u>P.O. WRITER</u> As items are added to the Item Master Record, they can be assigned to a particular catalog associated with a particular vendor. (SAP_0803520.) A particular catalog can be selected for searching by entering a CATALOGUE ID. (SAP_0803522-23.) The system may contain multiple CATALOGUE ID'S. (SAP_083522.)</p> <p><u>U.S. Patent No. 5,694,551</u> The master vendor catalog is assembled from information provided by individual vendors. (col. 8, ll. 47-60.)</p> <p><u>U.S. Patent No. 5,712,989</u> The inventory database includes data describing items available at various Distributor warehouses and for items from multiple vendors and third-party suppliers. (col. 3, ll. 18-21, 62-65; Fig. 1.)</p>
means for selecting the product catalogs to search;	<p><u>P.O. WRITER</u> A particular catalog can be selected for searching by entering a CATALOGUE ID.</p>

'683 Patent Claim Element	Disclosure of this Element in the Prior Art (page, column and line references are illustrative only and not comprehensive)
	<p>(SAP_0803522-23.)</p> <p><u>U.S. Patent No. 5,694,551</u> The customer initially selects the items to be available for searching using data files on vendor items. (col. 9, ll. 1-5.)</p> <p><u>U.S. Patent No. 5,712,989</u> A code may be included that limits item searches to particular Distributor warehouses. (col. 22, ll. 36-47.)</p>
means for searching for matching items among the selected product catalogs;	<p><u>P.O. WRITER</u> The selected catalogs can be searched by ITEM NUMBER, ITEM DESCRIPTION, COMMODITY CODE, or a portion of these criteria. (SAP_0803523-24.)</p> <p><u>U.S. Patent No. 5,694,551</u> The customer catalog may be searched by product group or keyword. (col. 5, 26-27.)</p> <p><u>U.S. Patent No. 5,712,989</u> Items may be searched for by catalog or reference number from a third-party vendor. (col. 8, ll. 25-46.) A code may be included that limits item searches to particular Distributor warehouses. (col. 22, ll. 36-47.)</p>
means for building a requisition using data relating to selected matching items and their associated source(s);	<p><u>P.O. WRITER</u> Items from the catalog screen can be selected for requisition by pressing F7. (SAP_0803526.)</p> <p><u>U.S. Patent No. 5,694,551</u> Quantity item ordering data can be entered directly onto the catalog screen and linked to the requisition screen. (col. 5, ll. 26-37.)</p>

'683 Patent Claim Element	Disclosure of this Element in the Prior Art (page, column and line references are illustrative only and not comprehensive)
	<p><u>U.S. Patent No. 5,712,989</u> Items entered by catalog or reference number are added to a Requisition Item table. (col. 8, ll. 40-46.)</p>
means for processing the requisition to generate one or more purchase orders for the selected matching items; and	<p><u>P.O. WRITER</u> A purchase order can be created from the requisition list by pressing F4. (SAP_0803528.) Requisitions including items purchased from different vendors are split into different purchase orders by vendor. (SAP_0804199.)</p> <p><u>U.S. Patent No. 5,694,551</u> Requisitions are segregated by supplier and sent as purchase orders to appropriate internal suppliers and outside vendors. (Abstract; col. 4, ll. 4-17.)</p> <p><u>U.S. Patent No. 5,712,989</u> The Distributor will create an order for items it does not regularly stock. (col. 5, ll. 37-48; col. 10, l. 64 – col. 11, l. 8.) Multiple orders are generated depending on product type. (col. 11, ll. 37-47; col. 16 ll. 30-36.)</p>
means for converting data related to a selected matching item and an associated source to data relating to an item at a different source.	<p><u>P.O. WRITER</u> During Purchase Order generation, the vendor listed on the requisition can be automatically converted to suggested vendors. (SAP_0804201-03.)</p> <p><u>U.S. Patent No. 5,712,989</u> The database may contain cross-references from Distributor's catalog number to its vendor's part number and to similar catalog numbers of other suppliers or distributors for the same Product, either as a part of the item record, in a separate cross-reference file or both. (col. 3, ll. 32-37.)</p>
4. The electronic sourcing system of claim 3 further	<p><u>P.O. WRITER</u> An inventory Control Module allows you to track on-hand inventory balances. (SAP_0802953.)</p>

'683 Patent Claim Element	Disclosure of this Element in the Prior Art (page, column and line references are illustrative only and not comprehensive)
comprising means for determining whether a selected matching item is available in inventory.	<p><u>U.S. Patent No. 5,694,551</u> The requisition status information retrieves information on items in a particular requisition, including whether an item is backordered. (col. 5, ll. 42-48; Fig. 11.)</p> <p><u>U.S. Patent No. 5,712,989</u> A code may be included that limits item searches to particular Distributor warehouses and backordered if the item is not found. (col. 22, ll. 36-47.)</p>
5. The electronic sourcing system of claim 3 further comprising means for determining the applicable price of a selected matching item.	<p><u>P.O. WRITER</u> As items are added to the Item Master Record, they can be assigned a STANDARD COST. (SAP_0803303-04.)</p> <p><u>U.S. Patent No. 5,694,551</u> Information on price is provided in and may be obtained from the customer catalog. (col. 5, ll. 24-35; col. 7, 58-64; col. 8, 54-58; col. 9, ll. 8-10.)</p> <p><u>U.S. Patent No. 5,712,989</u> Each item record include Distributor's list price, discount codes, and vendor list price. (col. 3, ll. 24-26, 50-54.)</p>
6. An electronic sourcing system comprising:	
a database containing data relating to items associated with at least two sources;	<p><u>P.O. WRITER</u> As items are added to the Item Master Record, they can be assigned to a particular catalog associated with a particular vendor. (SAP_0803520.) A particular catalog can be selected for searching by entering a CATALOGUE ID. (SAP_0803522-23.) The system may contain multiple CATALOGUE ID'S. (SAP_083522.)</p>

'683 Patent Claim Element	Disclosure of this Element in the Prior Art (page, column and line references are illustrative only and not comprehensive)
	<p><u>U.S. Patent No. 5,694,551</u> The master vendor catalog is assembled from information provided by individual vendors. (col. 8, ll. 47-60.)</p> <p><u>U.S. Patent No. 5,712,989</u> The inventory database includes data describing items available at various Distributor warehouses and for items from multiple vendors and third-party suppliers. (col. 3, ll. 18-21, 62-65; Fig. 1.)</p>
means for searching for matching items in the database;	<p><u>P.O. WRITER</u> The selected catalogs can be searched by ITEM NUMBER, ITEM DESCRIPTION, COMMODITY CODE, or a portion of these criteria. (SAP_0803523-24.)</p> <p><u>U.S. Patent No. 5,694,551</u> The customer catalog may be searched by product group or keyword. (col. 5, 26-27.)</p> <p><u>U.S. Patent No. 5,712,989</u> Items may be searched for by catalog or reference number from a third-party vendor. (col. 8, ll. 25-46.) A code may be included that limits item searches to particular Distributor warehouses. (col. 22, ll. 36-47.)</p>
means for building a requisition using data relating to selected matching items and their associated source(s);	<p><u>P.O. WRITER</u> Items from the catalog screen can be selected for requisition by pressing F7. (SAP_0803526.)</p> <p><u>U.S. Patent No. 5,694,551</u> Quantity item ordering data can be entered directly onto the catalog screen and linked to the requisition screen. (col. 5, ll. 26-37.)</p> <p><u>U.S. Patent No. 5,712,989</u></p>

'683 Patent Claim Element	Disclosure of this Element in the Prior Art (page, column and line references are illustrative only and not comprehensive)
	Items entered by catalog or reference number are added to a Requisition Item table. (col. 8, ll. 40-46.)
means for processing the requisition to generate one or more purchase orders for the selected matching items; and	<p><u>P.O. WRITER</u> A purchase order can be created from the requisition list by pressing F4. (SAP_0803528.) Requisitions including items purchased from different vendors are split into different purchase orders by vendor. (SAP_0804199.)</p> <p><u>U.S. Patent No. 5,694,551</u> Requisitions are segregated by supplier and sent as purchase orders to appropriate internal suppliers and outside vendors. (Abstract; col. 4, ll. 4-17.)</p> <p><u>U.S. Patent No. 5,712,989</u> The Distributor will create an order for items it does not regularly stock. (col. 5, ll. 37-48; col. 10, l. 64 – col. 11, l. 8.) Multiple orders are generated depending on product type. (col. 11, ll. 37-47; col. 16 ll. 30-36.)</p>
means for converting data relating to a selected matching item and an associated source to data relating to an item and a different source.	<p><u>P.O. WRITER</u> During Purchase Order generation, the vendor listed on the requisition can be automatically converted to suggested vendors. (SAP_0804201-03.)</p> <p><u>U.S. Patent No. 5,712,989</u> The database may contain cross-references from Distributor's catalog number to its vendor's part number and to similar catalog numbers of other suppliers or distributors for the same Product, either as a part of the item record, in a separate cross-reference file or both. (col. 3, ll. 32-37.)</p>
7. An electronic sourcing system of claim 6 wherein the requisition includes matching	<p><u>P.O. WRITER</u> Items from the catalog screen can be selected for requisition by pressing F7. (SAP_0803526.) Items from a second catalog can be selected for the same requisition by pressing CTRL+F5 to</p>

'683 Patent Claim Element	Disclosure of this Element in the Prior Art (page, column and line references are illustrative only and not comprehensive)
items from at least two sources.	switch catalogs. (SAP_0803526.)
8. The electronic sourcing system of claim 6 wherein the purchase orders include data relating to catalog numbers.	<p><u>P.O. WRITER</u> When an item is saved to the Item Master Record, it is associated with an ITEM NUMBER (SAP_0803304) and a CATALOGUE ID (SAP_0803520). The ITEM NUMBER is included on the final purchase order. (SAP_0803333.)</p> <p><u>U.S. Patent No. 5,694,551</u> Requisitions are segregated by supplier and sent as purchase orders to appropriate internal suppliers and outside vendors. (Abstract; col. 4, ll. 4-17.)</p> <p><u>U.S. Patent No. 5,712,989</u> The Distributor will create an order for items it does not regularly stock. (col. 5, ll. 37-48; col. 10, l. 64 – col. 11, l. 8.) Multiple orders are generated depending on product type. (col. 11, ll. 37-47; col. 16 ll. 30-36.)</p>
9. The electronic sourcing system of claim 6 further comprising means for determining whether a selected matching item is available in inventory.	<p><u>P.O. WRITER</u> An inventory Control Module allows you to track on-hand inventory balances. (SAP_0802953.)</p> <p><u>U.S. Patent No. 5,694,551</u> The requisition status information retrieves information on items in a particular requisition, including whether an item is backordered. (col. 5, ll. 42-48; Fig. 11.)</p> <p><u>U.S. Patent No. 5,712,989</u> A code may be included that limits item searches to particular Distributor warehouses and backordered if the item is not found. (col. 22, ll. 36-47.)</p>
10. The electronic sourcing system of claim 6 further	<p><u>P.O. WRITER</u> As items are added to the Item Master Record, they can be assigned a STANDARD COST.</p>

'683 Patent Claim Element	Disclosure of this Element in the Prior Art (page, column and line references are illustrative only and not comprehensive)
comprising means for determining the applicable price of a selected matching item.	<p>(SAP_0803303-04.)</p> <p><u>U.S. Patent No. 5,694,551</u> Information on price is provided in and may be obtained from the customer catalog. (col. 5, ll. 24-35; col. 7, 58-64; col. 8, 54-58; col. 9, ll. 8-10.)</p> <p><u>U.S. Patent No. 5,712,989</u> Each item record include Distributor's list price, discount codes, and vendor list price. (col. 3, ll. 24-26, 50-54.)</p>
11. An electronic sourcing system comprising:	
at least two product catalogs containing data relating to items associated with the respective sources;	<p><u>P.O. WRITER</u> As items are added to the Item Master Record, they can be assigned to a particular catalog associated with a particular vendor. (SAP_0803520.) A particular catalog can be selected for searching by entering a CATALOGUE ID. (SAP_0803522-23.) The system may contain multiple CATALOGUE ID'S. (SAP_083522.)</p> <p><u>U.S. Patent No. 5,694,551</u> The master vendor catalog is assembled from information provided by individual vendors. (col. 8, ll. 47-60.)</p> <p><u>U.S. Patent No. 5,712,989</u> The inventory database includes data describing items available at various Distributor warehouses and for items from multiple vendors and third-party suppliers. (col. 3, ll. 18-21, 62-65; Fig. 1.)</p>
means for searching for matching items among the	<p><u>P.O. WRITER</u> The selected catalogs can be searched by ITEM NUMBER, ITEM DESCRIPTION,</p>

'683 Patent Claim Element	Disclosure of this Element in the Prior Art (page, column and line references are illustrative only and not comprehensive)
product catalogs;	<p>COMMODITY CODE, or a portion of these criteria. (SAP_0803523-24.)</p> <p><u>U.S. Patent No. 5,694,551</u> The customer catalog may be searched by product group or keyword. (col. 5, 26-27.)</p> <p><u>U.S. Patent No. 5,712,989</u> Items may be searched for by catalog or reference number from a third-party vendor. (col. 8, ll. 25-46.) A code may be included that limits item searches to particular Distributor warehouses. (col. 22, ll. 36-47.)</p>
means for building a requisition that includes a first matching item and a second matching item, each associated with a different source;	<p><u>P.O. WRITER</u> Items from the catalog screen can be selected for requisition by pressing F7. (SAP_0803526.) Items from a second catalog can be selected for the same requisition by pressing CTRL+F5 to switch catalogs. (SAP_0803526.)</p> <p><u>U.S. Patent No. 5,694,551</u> Quantity item ordering data can be entered directly onto the catalog screen and linked to the requisition screen. (col. 5, ll. 26-37.)</p> <p><u>U.S. Patent No. 5,712,989</u> Items entered by catalog or reference number are added to a Requisition Item table. (col. 8, ll. 40-46.)</p>
means for processing the requisition to generate purchase orders for the first and second matching items; and	<p><u>P.O. WRITER</u> A purchase order can be created from the requisition list by pressing F4. (SAP_0803528.) Requisitions including items purchased from different vendors are split into different purchase orders by vendor. (SAP_0804199.)</p> <p><u>U.S. Patent No. 5,694,551</u></p>

'683 Patent Claim Element	Disclosure of this Element in the Prior Art (page, column and line references are illustrative only and not comprehensive)
	<p>Requisitions are segregated by supplier and sent as purchase orders to appropriate internal suppliers and outside vendors. (Abstract; col. 4, ll. 4-17.)</p> <p><u>U.S. Patent No. 5,712,989</u> The Distributor will create an order for items it does not regularly stock. (col. 5, ll. 37-48; col. 10, l. 64 – col. 11, l. 8.) Multiple orders are generated depending on product type. (col. 11, ll. 37-47; col. 16 ll. 30-36.)</p>
means for converting data relating to a selected matching item and an associated source to data relating to an item and a different source.	<p><u>P.O. WRITER</u> During Purchase Order generation, the vendor listed on the requisition can be automatically converted to suggested vendors. (SAP_0804201-03.)</p> <p><u>U.S. Patent No. 5,712,989</u> The database may contain cross-references from Distributor's catalog number to its vendor's part number and to similar catalog numbers of other suppliers or distributors for the same Product, either as a part of the item record, in a separate cross-reference file or both. (col. 3, ll. 32-37.)</p>
12. The electronic sourcing system of claim 11 wherein a first purchase order includes data relating to the first matching item.	<p><u>P.O. WRITER</u> A purchase order can be created from the requisition list by pressing F4. (SAP_0803528.) Requisitions including items purchased from different vendors are split into different purchase orders by vendor. (SAP_0804199.)</p> <p><u>U.S. Patent No. 5,694,551</u> Requisitions are segregated by supplier and sent as purchase orders to appropriate internal suppliers and outside vendors. (Abstract; col. 4, ll. 4-17.)</p> <p><u>U.S. Patent No. 5,712,989</u> The Distributor will create an order for items it does not regularly stock. (col. 5, ll. 37-48; col. 10, l. 64 – col. 11, l. 8.) Multiple orders are generated depending on product type. (col. 11, ll.</p>

'683 Patent Claim Element	Disclosure of this Element in the Prior Art (page, column and line references are illustrative only and not comprehensive)
	37-47; col. 16 ll. 30-36.)
13. The electronic sourcing system of claim 11 wherein a second purchase order includes data relating to the second matching item.	<p><u>P.O. WRITER</u> A purchase order can be created from the requisition list by pressing F4. (SAP_0803528.) Requisitions including items purchased from different vendors are split into different purchase orders by vendor. (SAP_0804199.)</p> <p><u>U.S. Patent No. 5,694,551</u> Requisitions are segregated by supplier and sent as purchase orders to appropriate internal suppliers and outside vendors. (Abstract; col. 4, ll. 4-17.)</p> <p><u>U.S. Patent No. 5,712,989</u> The Distributor will create an order for items it does not regularly stock. (col. 5, ll. 37-48; col. 10, l. 64 – col. 11, l. 8.) Multiple orders are generated depending on product type. (col. 11, ll. 37-47; col. 16 ll. 30-36.)</p>
14. An electronic sourcing system comprising:	
data relating to items associated with at least two sources maintained so that selected data may be searched separately;	<p><u>P.O. WRITER</u> As items are added to the Item Master Record, they can be assigned to a particular catalog associated with a particular vendor. (SAP_0803520.) A particular catalog can be selected for searching by entering a CATALOGUE ID. (SAP_0803522-23.) The system may contain multiple CATALOGUE ID'S. (SAP_083522.) A particular catalog can be selected for searching by entering a CATALOGUE ID. (SAP_0803522-23.)</p> <p><u>U.S. Patent No. 5,694,551</u> The master vendor catalog is assembled from information provided by individual vendors. (col. 8, ll. 47-60.) The customer initially selects the items to be available for searching using data files</p>

'683 Patent Claim Element	Disclosure of this Element in the Prior Art (page, column and line references are illustrative only and not comprehensive)
	<p>on vendor items. (col. 9, ll. 1-5.)</p> <p><u>U.S. Patent No. 5,712,989</u> The inventory database includes data describing items available at various Distributor warehouses and for items from multiple vendors and third-party suppliers. (col. 3, ll. 18-21, 62-65; Fig. 1.) A code may be included that limits item searches to particular Distributor warehouses. (col. 22, ll. 36-47.)</p>
means for searching for matching items among the selected data;	<p><u>P.O. WRITER</u> The selected catalogs can be searched by ITEM NUMBER, ITEM DESCRIPTION, COMMODITY CODE, or a portion of these criteria. (SAP_0803523-24.)</p> <p><u>U.S. Patent No. 5,694,551</u> The customer catalog may be searched by product group or keyword. (col. 5, 26-27.)</p> <p><u>U.S. Patent No. 5,712,989</u> Items may be searched for by catalog or reference number from a third-party vendor. (col. 8, ll. 25-46.) A code may be included that limits item searches to particular Distributor warehouses. (col. 22, ll. 36-47.)</p>
means for building a requisition using data relating to selected matching items and their associated source(s);	<p><u>P.O. WRITER</u> Items from the catalog screen can be selected for requisition by pressing F7. (SAP_0803526.)</p> <p><u>U.S. Patent No. 5,694,551</u> Quantity item ordering data can be entered directly onto the catalog screen and linked to the requisition screen. (col. 5, ll. 26-37.)</p> <p><u>U.S. Patent No. 5,712,989</u> Items entered by catalog or reference number are added to a Requisition Item table. (col. 8, ll.</p>

'683 Patent Claim Element	Disclosure of this Element in the Prior Art (page, column and line references are illustrative only and not comprehensive)
	40-46.)
means for processing the requisition to generate purchase orders using data relating to the selected matching items and their associated source(s); and	<p><u>P.O. WRITER</u> A purchase order can be created from the requisition list by pressing F4. (SAP_0803528.) Requisitions including items purchased from different vendors are split into different purchase orders by vendor. (SAP_0804199.)</p> <p><u>U.S. Patent No. 5,694,551</u> Requisitions are segregated by supplier and sent as purchase orders to appropriate internal suppliers and outside vendors. (Abstract; col. 4, ll. 4-17.)</p> <p><u>U.S. Patent No. 5,712,989</u> The Distributor will create an order for items it does not regularly stock. (col. 5, ll. 37-48; col. 10, l. 64 – col. 11, l. 8.) Multiple orders are generated depending on product type. (col. 11, ll. 37-47; col. 16 ll. 30-36.)</p>
means for converting data relating to a selected matching item and an associated source to data relating to an item and a different source.	<p><u>P.O. WRITER</u> During Purchase Order generation, the vendor listed on the requisition can be automatically converted to suggested vendors. (SAP_0804201-03.)</p> <p><u>U.S. Patent No. 5,712,989</u> The database may contain cross-references from Distributor's catalog number to its vendor's part number and to similar catalog numbers of other suppliers or distributors for the same Product, either as a part of the item record, in a separate cross-reference file or both. (col. 3, ll. 32-37.)</p>
15. The electronic sourcing system of claim 14 wherein the purchase orders use data relating to at least two sources.	<p><u>P.O. WRITER</u> Items from the catalog screen can be selected for requisition by pressing F7. (SAP_0803526.) Items from a second catalog can be selected for the same requisition by pressing CTRL+F5 to switch catalogs. (SAP_0803526.)</p>

'683 Patent Claim Element	Disclosure of this Element in the Prior Art (page, column and line references are illustrative only and not comprehensive)
	<p><u>U.S. Patent No. 5,694,551</u> Requisitions are segregated by supplier and sent as purchase orders to appropriate internal suppliers and outside vendors. (Abstract; col. 4, ll. 4-17.)</p> <p><u>U.S. Patent No. 5,712,989</u> The Distributor will create an order for items it does not regularly stock. (col. 5, ll. 37-48; col. 10, l. 64 – col. 11, l. 8.) Multiple orders are generated depending on product type. (col. 11, ll. 37-47; col. 16 ll. 30-36.)</p>
16. The electronic sourcing system of claim 14 wherein the purchase orders use data relating to catalog numbers.	<p><u>P.O. WRITER</u> When an item is saved to the Item Master Record, it is associated with an ITEM NUMBER (SAP_0803304) and a CATALOGUE ID (SAP_0803520). The ITEM NUMBER is included on the final purchase order. (SAP_0803333.)</p> <p><u>U.S. Patent No. 5,694,551</u> Requisitions are segregated by supplier and sent as purchase orders to appropriate internal suppliers and outside vendors. (Abstract; col. 4, ll. 4-17.)</p> <p><u>U.S. Patent No. 5,712,989</u> The Distributor will create an order for items it does not regularly stock. (col. 5, ll. 37-48; col. 10, l. 64 – col. 11, l. 8.) Multiple orders are generated depending on product type. (col. 11, ll. 37-47; col. 16 ll. 30-36.) The Part Master records include a manufacturer or supplier's catalog or part number, which is used on the purchase order. (col. 8, ll. 32-34.)</p>
17. The electronic sourcing system of claim 14 further comprising means for determining whether a selected	<p><u>P.O. WRITER</u> An inventory Control Module allows you to track on-hand inventory balances. (SAP_0802953.)</p> <p><u>U.S. Patent No. 5,694,551</u></p>

'683 Patent Claim Element	Disclosure of this Element in the Prior Art (page, column and line references are illustrative only and not comprehensive)
item is in inventory	<p>The requisition status information retrieves information on items in a particular requisition, including whether an item is backordered. (col. 5, ll. 42-48; Fig. 11.)</p> <p><u>U.S. Patent No. 5,712,989</u> A code may be included that limits item searches to particular Distributor warehouses and backordered if the item is not found. (col. 22, ll. 36-47.)</p>
18. The electronic sourcing system of claim 14 further comprising means for determining the applicable price of a selected matching item.	<p><u>P.O. WRITER</u> As items are added to the Item Master Record, they can be assigned a STANDARD COST. (SAP_0803303-04.)</p> <p><u>U.S. Patent No. 5,694,551</u> Information on price is provided in and may be obtained from the customer catalog. (col. 5, ll. 24-35; col. 7, 58-64; col. 8, 54-58; col. 9, ll. 8-10.)</p> <p><u>U.S. Patent No. 5,712,989</u> Each item record include Distributor's list price, discount codes, and vendor list price. (col. 3, ll. 24-26, 50-54.)</p>
19. An electronic sourcing system comprising:	
a database containing data relating to items associated with at least two vendors maintained so that selected portions of the database may be searched separately;	<p><u>P.O. WRITER</u> As items are added to the Item Master Record, they can be assigned to a particular catalog associated with a particular vendor. (SAP_0803520.) A particular catalog can be selected for searching by entering a CATALOGUE ID. (SAP_0803522-23.) The system may contain multiple CATALOGUE ID'S. (SAP_083522.) A particular catalog can be selected for searching by entering a CATALOGUE ID. (SAP_0803522-23.)</p>

'683 Patent Claim Element	Disclosure of this Element in the Prior Art (page, column and line references are illustrative only and not comprehensive)
	<p><u>U.S. Patent No. 5,694,551</u> The master vendor catalog is assembled from information provided by individual vendors. (col. 8, ll. 47-60.) The customer initially selects the items to be available for searching using data files on vendor items. (col. 9, ll. 1-5.)</p> <p><u>U.S. Patent No. 5,712,989</u> The inventory database includes data describing items available at various Distributor warehouses and for items from multiple vendors and third-party suppliers. (col. 3, ll. 18-21, 62-65; Fig. 1.) A code may be included that limits item searches to particular Distributor warehouses. (col. 22, ll. 36-47.)</p>
means for searching for matching items in the selected portions of the database;	<p><u>P.O. WRITER</u> The selected catalogs can be searched by ITEM NUMBER, ITEM DESCRIPTION, COMMODITY CODE, or a portion of these criteria. (SAP_0803523-24.)</p> <p><u>U.S. Patent No. 5,694,551</u> The customer catalog may be searched by product group or keyword. (col. 5, 26-27.)</p> <p><u>U.S. Patent No. 5,712,989</u> Items may be searched for by catalog or reference number from a third-party vendor. (col. 8, ll. 25-46.) A code may be included that limits item searches to particular Distributor warehouses. (col. 22, ll. 36-47.)</p>
means for building a requisition that includes data relating to selected matching items;	<p><u>P.O. WRITER</u> Items from the catalog screen can be selected for requisition by pressing F7. (SAP_0803526.)</p> <p><u>U.S. Patent No. 5,694,551</u> Quantity item ordering data can be entered directly onto the catalog screen and linked to the requisition screen. (col. 5, ll. 26-37.)</p>

'683 Patent Claim Element	Disclosure of this Element in the Prior Art (page, column and line references are illustrative only and not comprehensive)
	<p><u>U.S. Patent No. 5,712,989</u> Items entered by catalog or reference number are added to a Requisition Item table. (col. 8, ll. 40-46.)</p>
means for processing the requisition to generate purchase orders for selected matching items.	<p><u>P.O. WRITER</u> A purchase order can be created from the requisition list by pressing F4. (SAP_0803528.) Requisitions including items purchased from different vendors are split into different purchase orders by vendor. (SAP_0804199.)</p> <p><u>U.S. Patent No. 5,694,551</u> Requisitions are segregated by supplier and sent as purchase orders to appropriate internal suppliers and outside vendors. (Abstract; col. 4, ll. 4-17.)</p> <p><u>U.S. Patent No. 5,712,989</u> The Distributor will create an order for items it does not regularly stock. (col. 5, ll. 37-48; col. 10, l. 64 – col. 11, l. 8.) Multiple orders are generated depending on product type. (col. 11, ll. 37-47; col. 16 ll. 30-36.)</p>
20. The electronic sourcing system of claim 19 wherein the purchase orders include data relating to vendor catalog numbers.	<p><u>P.O. WRITER</u> When an item is saved to the Item Master Record, it is associated with an ITEM NUMBER (SAP_0803304) and a CATALOGUE ID (SAP_0803520). The ITEM NUMBER is included on the final purchase order. (SAP_0803333.)</p> <p><u>U.S. Patent No. 5,712,989</u> The Distributor will create an order for items it does not regularly stock. (col. 5, ll. 37-48; col. 10, l. 64 – col. 11, l. 8.) Multiple orders are generated depending on product type. (col. 11, ll. 37-47; col. 16 ll. 30-36.) The Part Master records include a manufacturer or supplier's catalog or part number, which is used on the purchase order. (col. 8, ll. 32-34.)</p>

'683 Patent Claim Element	Disclosure of this Element in the Prior Art (page, column and line references are illustrative only and not comprehensive)
21. The electronic sourcing system of claim 19 further comprising means for converting data relating to a selected matching item and an associated source to data relating to an item from a different source.	<p><u>P.O. WRITER</u> During Purchase Order generation, the vendor listed on the requisition can be automatically converted to suggested vendors. (SAP_0804201-03.)</p> <p><u>U.S. Patent No. 5,712,989</u> The database may contain cross-references from Distributor's catalog number to its vendor's part number and to similar catalog numbers of other suppliers or distributors for the same Product, either as a part of the item record, in a separate cross-reference file or both. (col. 3, ll. 32-37.)</p>
22. The electronic sourcing system of claim 19 further comprising means for determining whether a selected matching is available in inventory.	<p><u>P.O. WRITER</u> An inventory Control Module allows you to track on-hand inventory balances. (SAP_0802953.)</p> <p><u>U.S. Patent No. 5,694,551</u> The requisition status information retrieves information on items in a particular requisition, including whether an item is backordered. (col. 5, ll. 42-48; Fig. 11.)</p> <p><u>U.S. Patent No. 5,712,989</u> A code may be included that limits item searches to particular Distributor warehouses and backordered if the item is not found. (col. 22, ll. 36-47.)</p>
23. The electronic sourcing system of claim 19 further comprising means for determining the applicable price of a selected matching item.	<p><u>P.O. WRITER</u> As items are added to the Item Master Record, they can be assigned a STANDARD COST. (SAP_0803303-04.)</p> <p><u>U.S. Patent No. 5,694,551</u> Information on price is provided in and may be obtained from the customer catalog. (col. 5, ll. 24-35; col. 7, 58-64; col. 8, 54-58; col. 9, ll. 8-10.)</p>

'683 Patent Claim Element	Disclosure of this Element in the Prior Art (page, column and line references are illustrative only and not comprehensive)
	<p><u>U.S. Patent No. 5,712,989</u> Each item record include Distributor's list price, discount codes, and vendor list price. (col. 3, ll. 24-26, 50-54.)</p>
24. The electronic sourcing system of claim 19 wherein the requisition includes matching items from at least two sources.	<p><u>P.O. WRITER</u> Items from the catalog screen can be selected for requisition by pressing F7. (SAP_0803526.) Items from a second catalog can be selected for the same requisition by pressing CTRL+F5 to switch catalogs. (SAP_0803526.)</p> <p><u>U.S. Patent No. 5,694,551</u> Quantity item ordering data can be entered directly onto the catalog screen and linked to the requisition screen. (col. 5, ll. 26-37.)</p> <p><u>U.S. Patent No. 5,712,989</u> Items entered by catalog or reference number are added to a Requisition Item table. (col. 8, ll. 40-46.)</p>
25. The electronic sourcing system of claim 19 wherein the purchase orders include data relating to the source associated with the selected matching item.	<p><u>P.O. WRITER</u> A purchase order can be created from the requisition list by pressing F4. (SAP_0803528.) Requisitions including items purchased from different vendors are split into different purchase orders by vendor. (SAP_0804199.)</p> <p><u>U.S. Patent No. 5,694,551</u> Requisitions are segregated by supplier and sent as purchase orders to appropriate internal suppliers and outside vendors. (Abstract; col. 4, ll. 4-17.)</p> <p><u>U.S. Patent No. 5,712,989</u> The Distributor will create an order for items it does not regularly stock. (col. 5, ll. 37-48; col. 10, l. 64 – col. 11, l. 8.) Multiple orders are generated depending on product type. (col. 11, ll.</p>

'683 Patent Claim Element	Disclosure of this Element in the Prior Art (page, column and line references are illustrative only and not comprehensive)
	37-47; col. 16 ll. 30-36.)
26. A method comprising the steps of:	
maintaining at least two products catalogs on a database containing data relating to items associated with the respective sources;	<p><u>P.O. WRITER</u> As items are added to the Item Master Record, they can be assigned to a particular catalog associated with a particular vendor. (SAP_0803520.) A particular catalog can be selected for searching by entering a CATALOGUE ID. (SAP_0803522-23.) The system may contain multiple CATALOGUE ID'S. (SAP_083522.)</p> <p><u>U.S. Patent No. 5,694,551</u> The master vendor catalog is assembled from information provided by individual vendors. (col. 8, ll. 47-60.)</p> <p><u>U.S. Patent No. 5,712,989</u> The inventory database includes data describing items available at various Distributor warehouses and for items from multiple vendors and third-party suppliers. (col. 3, ll. 18-21, 62-65; Fig. 1.)</p>
selecting the product catalogs to search;	<p><u>P.O. WRITER</u> A particular catalog can be selected for searching by entering a CATALOGUE ID. (SAP_0803522-23.)</p> <p><u>U.S. Patent No. 5,694,551</u> The customer initially selects the items to be available for searching using data files on vendor items. (col. 9, ll. 1-5.)</p> <p><u>U.S. Patent No. 5,712,989</u> A code may be included that limits item searches to particular Distributor warehouses. (col. 22,</p>

'683 Patent Claim Element	Disclosure of this Element in the Prior Art (page, column and line references are illustrative only and not comprehensive)
	ll. 36-47.)
searching for matching items among the selected product catalogs;	<p><u>P.O. WRITER</u> The selected catalogs can be searched by ITEM NUMBER, ITEM DESCRIPTION, COMMODITY CODE, or a portion of these criteria. (SAP_0803523-24.)</p> <p><u>U.S. Patent No. 5,694,551</u> The customer catalog may be searched by product group or keyword. (col. 5, 26-27.)</p> <p><u>U.S. Patent No. 5,712,989</u> Items may be searched for by catalog or reference number from a third-party vendor. (col. 8, ll. 25-46.) A code may be included that limits item searches to particular Distributor warehouses. (col. 22, ll. 36-47.)</p>
building a requisition using data relating to selected matching items and their associated sources;	<p><u>P.O. WRITER</u> Items from the catalog screen can be selected for requisition by pressing F7. (SAP_0803526.)</p> <p><u>U.S. Patent No. 5,694,551</u> Quantity item ordering data can be entered directly onto the catalog screen and linked to the requisition screen. (col. 5, ll. 26-37.)</p> <p><u>U.S. Patent No. 5,712,989</u> Items entered by catalog or reference number are added to a Requisition Item table. (col. 8, ll. 40-46.)</p>
processing the requisition to generate one or more purchase orders for the selected matching items; and	<p><u>P.O. WRITER</u> A purchase order can be created from the requisition list by pressing F4. (SAP_0803528.) Requisitions including items purchased from different vendors are split into different purchase orders by vendor. (SAP_0804199.)</p>

'683 Patent Claim Element	Disclosure of this Element in the Prior Art (page, column and line references are illustrative only and not comprehensive)
	<p><u>U.S. Patent No. 5,694,551</u> Requisitions are segregated by supplier and sent as purchase orders to appropriate internal suppliers and outside vendors. (Abstract; col. 4, ll. 4-17.)</p> <p><u>U.S. Patent No. 5,712,989</u> The Distributor will create an order for items it does not regularly stock. (col. 5, ll. 37-48; col. 10, l. 64 – col. 11, l. 8.) Multiple orders are generated depending on product type. (col. 11, ll. 37-47; col. 16 ll. 30-36.)</p>
determining whether a selected matching item is available in inventory.	<p><u>P.O. WRITER</u> An inventory Control Module allows you to track on-hand inventory balances. (SAP_0802953.)</p> <p><u>U.S. Patent No. 5,694,551</u> The requisition status information retrieves information on items in a particular requisition, including whether an item is backordered. (col. 5, ll. 42-48; Fig. 11.)</p> <p><u>U.S. Patent No. 5,712,989</u> A code may be included that limits item searches to particular Distributor warehouses and backordered if the item is not found. (col. 22, ll. 36-47.)</p>
27. The method of claim 26 wherein the purchase orders include data relating to a vendor catalog for the selected matching item.	<p><u>P.O. WRITER</u> When an item is saved to the Item Master Record, it is associated with an ITEM NUMBER (SAP_0803304) and a CATALOGUE ID (SAP_0803520). The ITEM NUMBER is included on the final purchase order. (SAP_0803333.)</p> <p><u>U.S. Patent No. 5,712,989</u> The Distributor will create an order for items it does not regularly stock. (col. 5, ll. 37-48; col. 10, l. 64 – col. 11, l. 8.) Multiple orders are generated depending on product type. (col. 11, ll.</p>

'683 Patent Claim Element	Disclosure of this Element in the Prior Art (page, column and line references are illustrative only and not comprehensive)
	37-47; col. 16 ll. 30-36.) The Part Master records include a manufacturer or supplier's catalog or part number, which is used on the purchase order. (col. 8, ll. 32-34.)
28. A method comprising the steps of:	
maintaining at least two product catalogs on a database containing data relating to items associated with the representative sources;	<p><u>P.O. WRITER</u> As items are added to the Item Master Record, they can be assigned to a particular catalog associated with a particular vendor. (SAP_0803520.) A particular catalog can be selected for searching by entering a CATALOGUE ID. (SAP_0803522-23.) The system may contain multiple CATALOGUE ID'S. (SAP_083522.)</p> <p><u>U.S. Patent No. 5,694,551</u> The master vendor catalog is assembled from information provided by individual vendors. (col. 8, ll. 47-60.)</p> <p><u>U.S. Patent No. 5,712,989</u> The inventory database includes data describing items available at various Distributor warehouses and for items from multiple vendors and third-party suppliers. (col. 3, ll. 18-21, 62-65; Fig. 1.)</p>
selecting the product catalogs to search;	<p><u>P.O. WRITER</u> A particular catalog can be selected for searching by entering a CATALOGUE ID. (SAP_0803522-23.)</p> <p><u>U.S. Patent No. 5,694,551</u> The customer initially selects the items to be available for searching using data files on vendor items. (col. 9, ll. 1-5.)</p> <p><u>U.S. Patent No. 5,712,989</u></p>

'683 Patent Claim Element	Disclosure of this Element in the Prior Art (page, column and line references are illustrative only and not comprehensive)
	A code may be included that limits item searches to particular Distributor warehouses. (col. 22, ll. 36-47.)
searching for matching items among the selected product catalogs;	<p><u>P.O. WRITER</u> The selected catalogs can be searched by ITEM NUMBER, ITEM DESCRIPTION, COMMODITY CODE, or a portion of these criteria. (SAP_0803523-24.)</p> <p><u>U.S. Patent No. 5,694,551</u> The customer catalog may be searched by product group or keyword. (col. 5, 26-27.)</p> <p><u>U.S. Patent No. 5,712,989</u> Items may be searched for by catalog or reference number from a third-party vendor. (col. 8, ll. 25-46.) A code may be included that limits item searches to particular Distributor warehouses. (col. 22, ll. 36-47.)</p>
building a requisition using data relating to selected matching items and their associated source(s);	<p><u>P.O. WRITER</u> Items from the catalog screen can be selected for requisition by pressing F7. (SAP_0803526.)</p> <p><u>U.S. Patent No. 5,694,551</u> Quantity item ordering data can be entered directly onto the catalog screen and linked to the requisition screen. (col. 5, ll. 26-37.)</p> <p><u>U.S. Patent No. 5,712,989</u> Items entered by catalog or reference number are added to a Requisition Item table. (col. 8, ll. 40-46.)</p>
processing the requisition to generate one or more purchase orders for the selected	<p><u>P.O. WRITER</u> A purchase order can be created from the requisition list by pressing F4. (SAP_0803528.) Requisitions including items purchased from different vendors are split into different purchase</p>

'683 Patent Claim Element	Disclosure of this Element in the Prior Art (page, column and line references are illustrative only and not comprehensive)
matching items; and	<p>orders by vendor. (SAP_0804199.)</p> <p><u>U.S. Patent No. 5,694,551</u> Requisitions are segregated by supplier and sent as purchase orders to appropriate internal suppliers and outside vendors. (Abstract; col. 4, ll. 4-17.)</p> <p><u>U.S. Patent No. 5,712,989</u> The Distributor will create an order for items it does not regularly stock. (col. 5, ll. 37-48; col. 10, l. 64 – col. 11, l. 8.) Multiple orders are generated depending on product type. (col. 11, ll. 37-47; col. 16 ll. 30-36.)</p>
converting data relating to a selected matching item and an associated source to data relating to an item and a different source.	<p><u>P.O. WRITER</u> During Purchase Order generation, the vendor listed on the requisition can be automatically converted to suggested vendors. (SAP_0804201-03.)</p> <p><u>U.S. Patent No. 5,712,989</u> The database may contain cross-references from Distributor's catalog number to its vendor's part number and to similar catalog numbers of other suppliers or distributors for the same Product, either as a part of the item record, in a separate cross-reference file or both. (col. 3, ll. 32-37.)</p>
29. The method of claim 28 further comprising the step of determining whether a selected matching item is available in inventory.	<p><u>P.O. WRITER</u> An inventory Control Module allows you to track on-hand inventory balances. (SAP_0802953.)</p> <p><u>U.S. Patent No. 5,694,551</u> The requisition status information retrieves information on items in a particular requisition, including whether an item is backordered. (col. 5, ll. 42-48; Fig. 11.)</p> <p><u>U.S. Patent No. 5,712,989</u> A code may be included that limits item searches to particular Distributor warehouses and</p>

'683 Patent Claim Element	Disclosure of this Element in the Prior Art (page, column and line references are illustrative only and not comprehensive)
	backordered if the item is not found. (col. 22, ll. 36-47.)
30. The method of claim 28 further comprising the step of determining the applicable price of a selected of a selected matching item.	<p><u>P.O. WRITER</u> As items are added to the Item Master Record, they can be assigned a STANDARD COST. (SAP_0803303-04.)</p> <p><u>U.S. Patent No. 5,694,551</u> Information on price is provided in and may be obtained from the customer catalog. (col. 5, ll. 24-35; col. 7, 58-64; col. 8, 54-58; col. 9, ll. 8-10.)</p> <p><u>U.S. Patent No. 5,712,989</u> Each item record include Distributor's list price, discount codes, and vendor list price. (col. 3, ll. 24-26, 50-54.)</p>
31. A method comprising the steps of:	
maintaining a database containing data relating to items associated with at least two sources;	<p><u>P.O. WRITER</u> As items are added to the Item Master Record, they can be assigned to a particular catalog associated with a particular vendor. (SAP_0803520.) A particular catalog can be selected for searching by entering a CATALOGUE ID. (SAP_0803522-23.) The system may contain multiple CATALOGUE ID'S. (SAP_083522.)</p> <p><u>U.S. Patent No. 5,694,551</u> The master vendor catalog is assembled from information provided by individual vendors. (col. 8, ll. 47-60.)</p> <p><u>U.S. Patent No. 5,712,989</u> The inventory database includes data describing items available at various Distributor warehouses</p>

'683 Patent Claim Element	Disclosure of this Element in the Prior Art (page, column and line references are illustrative only and not comprehensive)
	and for items from multiple vendors and third-party suppliers. (col. 3, ll. 18-21, 62-65; Fig. 1.)
searching for matching items among the data relating to the items;	<p><u>P.O. WRITER</u> The selected catalogs can be searched by ITEM NUMBER, ITEM DESCRIPTION, COMMODITY CODE, or a portion of these criteria. (SAP_0803523-24.)</p> <p><u>U.S. Patent No. 5,694,551</u> The customer catalog may be searched by product group or keyword. (col. 5, 26-27.)</p> <p><u>U.S. Patent No. 5,712,989</u> Items may be searched for by catalog or reference number from a third-party vendor. (col. 8, ll. 25-46.) A code may be included that limits item searches to particular Distributor warehouses. (col. 22, ll. 36-47.)</p>
building a requisition using data relating to selected matching items and their associated sources;	<p><u>P.O. WRITER</u> Items from the catalog screen can be selected for requisition by pressing F7. (SAP_0803526.)</p> <p><u>U.S. Patent No. 5,694,551</u> Quantity item ordering data can be entered directly onto the catalog screen and linked to the requisition screen. (col. 5, ll. 26-37.)</p> <p><u>U.S. Patent No. 5,712,989</u> Items entered by catalog or reference number are added to a Requisition Item table. (col. 8, ll. 40-46.)</p>
processing the requisition to generate purchase orders using data relating to selected matching items and their	<p><u>P.O. WRITER</u> A purchase order can be created from the requisition list by pressing F4. (SAP_0803528.) Requisitions including items purchased from different vendors are split into different purchase orders by vendor. (SAP_0804199.)</p>

'683 Patent Claim Element	Disclosure of this Element in the Prior Art (page, column and line references are illustrative only and not comprehensive)
associated source(s); and	<p><u>U.S. Patent No. 5,694,551</u> Requisitions are segregated by supplier and sent as purchase orders to appropriate internal suppliers and outside vendors. (Abstract; col. 4, ll. 4-17.)</p> <p><u>U.S. Patent No. 5,712,989</u> The Distributor will create an order for items it does not regularly stock. (col. 5, ll. 37-48; col. 10, l. 64 – col. 11, l. 8.) Multiple orders are generated depending on product type. (col. 11, ll. 37-47; col. 16 ll. 30-36.)</p>
converting data relating to a selected matching item and an associated source to data relating to an item and a different source.	<p><u>P.O. WRITER</u> During Purchase Order generation, the vendor listed on the requisition can be automatically converted to suggested vendors. (SAP_0804201-03.)</p> <p><u>U.S. Patent No. 5,712,989</u> The database may contain cross-references from Distributor's catalog number to its vendor's part number and to similar catalog numbers of other suppliers or distributors for the same Product, either as a part of the item record, in a separate cross-reference file or both. (col. 3, ll. 32-37.)</p>
32. The method of claim 31 wherein the purchase orders use data relating to at least two sources.	<p><u>P.O. WRITER</u> Items from the catalog screen can be selected for requisition by pressing F7. (SAP_0803526.) Items from a second catalog can be selected for the same requisition by pressing CTRL+F5 to switch catalogs. (SAP_0803526.) A purchase order can be created from the requisition list by pressing F4. (SAP_0803528.) Requisitions including items purchased from different vendors are split into different purchase orders by vendor. (SAP_0804199.)</p> <p><u>U.S. Patent No. 5,694,551</u> Requisitions are segregated by supplier and sent as purchase orders to appropriate internal suppliers and outside vendors. (Abstract; col. 4, ll. 4-17.)</p>

'683 Patent Claim Element	Disclosure of this Element in the Prior Art (page, column and line references are illustrative only and not comprehensive)
	<p><u>U.S. Patent No. 5,712,989</u> The Distributor will create an order for items it does not regularly stock. (col. 5, ll. 37-48; col. 10, l. 64 – col. 11, l. 8.) Multiple orders are generated depending on product type. (col. 11, ll. 37-47; col. 16 ll. 30-36.)</p>
33. The method of claim 31 wherein the purchase orders use data relating to catalog numbers.	<p><u>P.O. WRITER</u> When an item is saved to the Item Master Record, it is associated with an ITEM NUMBER (SAP_0803304) and a CATALOGUE ID (SAP_0803520). The ITEM NUMBER is included on the final purchase order. (SAP_0803333.)</p> <p><u>U.S. Patent No. 5,694,551</u> Quantity item ordering data can be entered directly onto the catalog screen and linked to the requisition screen. (col. 5, ll. 26-37.)</p> <p><u>U.S. Patent No. 5,712,989</u> The Distributor will create an order for items it does not regularly stock. (col. 5, ll. 37-48; col. 10, l. 64 – col. 11, l. 8.) Multiple orders are generated depending on product type. (col. 11, ll. 37-47; col. 16 ll. 30-36.) The Part Master records include a manufacturer or supplier's catalog or part number, which is used on the purchase order. (col. 8, ll. 32-34.)</p>
34. The method of claim 31 further comprising the step of determining whether a selected matching item is available in inventory.	<p><u>P.O. WRITER</u> An inventory Control Module allows you to track on-hand inventory balances. (SAP_0802953.)</p> <p><u>U.S. Patent No. 5,694,551</u> The requisition status information retrieves information on items in a particular requisition, including whether an item is backordered. (col. 5, ll. 42-48; Fig. 11.)</p> <p><u>U.S. Patent No. 5,712,989</u></p>

'683 Patent Claim Element	Disclosure of this Element in the Prior Art (page, column and line references are illustrative only and not comprehensive)
	A code may be included that limits item searches to particular Distributor warehouses and backordered if the item is not found. (col. 22, ll. 36-47.)
35. The method of claim 31 further comprising the step of determining the applicable price of a selected matching item.	<p><u>P.O. WRITER</u> As items are added to the Item Master Record, they can be assigned a STANDARD COST. (SAP_0803303-04.)</p> <p><u>U.S. Patent No. 5,694,551</u> Information on price is provided in and may be obtained from the customer catalog. (col. 5, ll. 24-35; col. 7, 58-64; col. 8, 54-58; col. 9, ll. 8-10.)</p> <p><u>U.S. Patent No. 5,712,989</u> Each item record include Distributor's list price, discount codes, and vendor list price. (col. 3, ll. 24-26, 50-54.)</p>
36. A method comprising the steps of:	
maintaining a database containing at least two product catalogs containing data relating to items associated with the respective sources;	<p><u>P.O. WRITER</u> As items are added to the Item Master Record, they can be assigned to a particular catalog associated with a particular vendor. (SAP_0803520.) A particular catalog can be selected for searching by entering a CATALOGUE ID. (SAP_0803522-23.) The system may contain multiple CATALOGUE ID'S. (SAP_083522.)</p> <p><u>U.S. Patent No. 5,694,551</u> The master vendor catalog is assembled from information provided by individual vendors. (col. 8, ll. 47-60.)</p> <p><u>U.S. Patent No. 5,712,989</u></p>

'683 Patent Claim Element	Disclosure of this Element in the Prior Art (page, column and line references are illustrative only and not comprehensive)
	The inventory database includes data describing items available at various Distributor warehouses and for items from multiple vendors and third-party suppliers. (col. 3, ll. 18-21, 62-65; Fig. 1.)
searching for matching items among the product catalogs;	<p><u>P.O. WRITER</u> The selected catalogs can be searched by ITEM NUMBER, ITEM DESCRIPTION, COMMODITY CODE, or a portion of these criteria. (SAP_0803523-24.)</p> <p><u>U.S. Patent No. 5,694,551</u> The customer catalog may be searched by product group or keyword. (col. 5, 26-27.)</p> <p><u>U.S. Patent No. 5,712,989</u> Items may be searched for by catalog or reference number from a third-party vendor. (col. 8, ll. 25-46.) A code may be included that limits item searches to particular Distributor warehouses. (col. 22, ll. 36-47.)</p>
building a requisition that includes a first matching item and a second matching item, each from a different product catalog;	<p><u>P.O. WRITER</u> Items from the catalog screen can be selected for requisition by pressing F7. (SAP_0803526.) Items from a second catalog can be selected for the same requisition by pressing CTRL+F5 to switch catalogs. (SAP_0803526.)</p> <p><u>U.S. Patent No. 5,694,551</u> Quantity item ordering data can be entered directly onto the catalog screen and linked to the requisition screen. (col. 5, ll. 26-37.)</p> <p><u>U.S. Patent No. 5,712,989</u> Items entered by catalog or reference number are added to a Requisition Item table. (col. 8, ll. 40-46.)</p>
processing the requisition to	<u>P.O. WRITER</u>

'683 Patent Claim Element	Disclosure of this Element in the Prior Art (page, column and line references are illustrative only and not comprehensive)
generate purchase orders for the first and second matching items; and	<p>A purchase order can be created from the requisition list by pressing F4. (SAP_0803528.) Requisitions including items purchased from different vendors are split into different purchase orders by vendor. (SAP_0804199.)</p> <p><u>U.S. Patent No. 5,694,551</u> Requisitions are segregated by supplier and sent as purchase orders to appropriate internal suppliers and outside vendors. (Abstract; col. 4, ll. 4-17.)</p> <p><u>U.S. Patent No. 5,712,989</u> The Distributor will create an order for items it does not regularly stock. (col. 5, ll. 37-48; col. 10, l. 64 – col. 11, l. 8.) Multiple orders are generated depending on product type. (col. 11, ll. 37-47; col. 16 ll. 30-36.)</p>
converting data relating to a selected matching item and an associated source to data relating to an item and a different source.	<p><u>P.O. WRITER</u> During Purchase Order generation, the vendor listed on the requisition can be automatically converted to suggested vendors. (SAP_0804201-03.)</p> <p><u>U.S. Patent No. 5,712,989</u> The database may contain cross-references from Distributor's catalog number to its vendor's part number and to similar catalog numbers of other suppliers or distributors for the same Product, either as a part of the item record, in a separate cross-reference file or both. (col. 3, ll. 32-37.)</p>
37. The method of claim 36 wherein a first purchase order uses data relating to the first matching item and a second purchase order uses data relating to the second matching catalog item.	<p><u>P.O. WRITER</u> Items from the catalog screen can be selected for requisition by pressing F7. (SAP_0803526.) Items from a second catalog can be selected for the same requisition by pressing CTRL+F5 to switch catalogs. (SAP_0803526.) A purchase order can be created from the requisition list by pressing F4. (SAP_0803528.) Requisitions including items purchased from different vendors are split into different purchase orders by vendor. (SAP_0804199.)</p>

'683 Patent Claim Element	Disclosure of this Element in the Prior Art (page, column and line references are illustrative only and not comprehensive)
	<p><u>U.S. Patent No. 5,694,551</u> Requisitions are segregated by supplier and sent as purchase orders to appropriate internal suppliers and outside vendors. (Abstract; col. 4, ll. 4-17.)</p> <p><u>U.S. Patent No. 5,712,989</u> The Distributor will create an order for items it does not regularly stock. (col. 5, ll. 37-48; col. 10, l. 64 – col. 11, l. 8.) Multiple orders are generated depending on product type. (col. 11, ll. 37-47; col. 16 ll. 30-36.)</p>
38. The method of claim 36 further comprising the step of determining whether a selected matching item is available in inventory.	<p><u>P.O. WRITER</u> An inventory Control Module allows you to track on-hand inventory balances. (SAP_0802953.)</p> <p><u>U.S. Patent No. 5,694,551</u> The requisition status information retrieves information on items in a particular requisition, including whether an item is backordered. (col. 5, ll. 42-48; Fig. 11.)</p> <p><u>U.S. Patent No. 5,712,989</u> A code may be included that limits item searches to particular Distributor warehouses and backordered if the item is not found. (col. 22, ll. 36-47.)</p>
39. The method of claim 36 further comprising the step of determining the applicable price of a selected matching item.	<p><u>P.O. WRITER</u> As items are added to the Item Master Record, they can be assigned a STANDARD COST. (SAP_0803303-04.)</p> <p><u>U.S. Patent No. 5,694,551</u> Information on price is provided in and may be obtained from the customer catalog. (col. 5, ll. 24-35; col. 7, 58-64; col. 8, 54-58; col. 9, ll. 8-10.)</p> <p><u>U.S. Patent No. 5,712,989</u></p>

'683 Patent Claim Element	Disclosure of this Element in the Prior Art (page, column and line references are illustrative only and not comprehensive)
	Each item record include Distributor's list price, discount codes, and vendor list price. (col. 3, ll. 24-26, 50-54.)
40. A method comprising the steps of:	
maintaining a database containing data relating to items associated with at least two sources whereby selected portions of the database may be searched separately;	<p><u>P.O. WRITER</u> As items are added to the Item Master Record, they can be assigned to a particular catalog associated with a particular vendor. (SAP_0803520.) A particular catalog can be selected for searching by entering a CATALOGUE ID. (SAP_0803522-23.) The system may contain multiple CATALOGUE ID'S. (SAP_083522.) A particular catalog can be selected for searching by entering a CATALOGUE ID. (SAP_0803522-23.)</p> <p><u>U.S. Patent No. 5,694,551</u> The master vendor catalog is assembled from information provided by individual vendors. (col. 8, ll. 47-60.) The customer initially selects the items to be available for searching using data files on vendor items. (col. 9, ll. 1-5.)</p> <p><u>U.S. Patent No. 5,712,989</u> The inventory database includes data describing items available at various Distributor warehouses and for items from multiple vendors and third-party suppliers. (col. 3, ll. 18-21, 62-65; Fig. 1.) A code may be included that limits item searches to particular Distributor warehouses. (col. 22, ll. 36-47.)</p>
searching for matching items among the selected portions of the database;	<p><u>P.O. WRITER</u> The selected catalogs can be searched by ITEM NUMBER, ITEM DESCRIPTION, COMMODITY CODE, or a portion of these criteria. (SAP_0803523-24.)</p> <p><u>U.S. Patent No. 5,694,551</u></p>

'683 Patent Claim Element	Disclosure of this Element in the Prior Art (page, column and line references are illustrative only and not comprehensive)
	<p>The customer catalog may be searched by product group or keyword. (col. 5, 26-27.)</p> <p><u>U.S. Patent No. 5,712,989</u></p> <p>Items may be searched for by catalog or reference number from a third-party vendor. (col. 8, ll. 25-46.) A code may be included that limits item searches to particular Distributor warehouses. (col. 22, ll. 36-47.)</p>
building a requisition using data relating to selected matching items and their associated source(s);	<p><u>P.O. WRITER</u></p> <p>Items from the catalog screen can be selected for requisition by pressing F7. (SAP_0803526.)</p> <p><u>U.S. Patent No. 5,694,551</u></p> <p>Quantity item ordering data can be entered directly onto the catalog screen and linked to the requisition screen. (col. 5, ll. 26-37.)</p> <p><u>U.S. Patent No. 5,712,989</u></p> <p>Items entered by catalog or reference number are added to a Requisition Item table. (col. 8, ll. 40-46.)</p>
processing the requisition to generate purchase orders using data relating to the selected matching items and their associated source(s); and	<p><u>P.O. WRITER</u></p> <p>A purchase order can be created from the requisition list by pressing F4. (SAP_0803528.) Requisitions including items purchased from different vendors are split into different purchase orders by vendor. (SAP_0804199.)</p> <p><u>U.S. Patent No. 5,694,551</u></p> <p>Requisitions are segregated by supplier and sent as purchase orders to appropriate internal suppliers and outside vendors. (Abstract; col. 4, ll. 4-17.)</p> <p><u>U.S. Patent No. 5,712,989</u></p> <p>The Distributor will create an order for items it does not regularly stock. (col. 5, ll. 37-48; col. 10, l. 64 – col. 11, l. 8.) Multiple orders are generated depending on product type. (col. 11, ll.</p>

'683 Patent Claim Element	Disclosure of this Element in the Prior Art (page, column and line references are illustrative only and not comprehensive)
	37-47; col. 16 ll. 30-36.)
determining whether the selected matching item is available in inventory.	<p><u>P.O. WRITER</u> An inventory Control Module allows you to track on-hand inventory balances. (SAP_0802953.)</p> <p><u>U.S. Patent No. 5,694,551</u> The requisition status information retrieves information on items in a particular requisition, including whether an item is backordered. (col. 5, ll. 42-48; Fig. 11.)</p> <p><u>U.S. Patent No. 5,712,989</u> A code may be included that limits item searches to particular Distributor warehouses and backordered if the item is not found. (col. 22, ll. 36-47.)</p>
41. A method comprising the steps of:	
maintaining a database containing data relating to items associated with at least two sources whereby selected portions of the database may be searched separately;	<p><u>P.O. WRITER</u> As items are added to the Item Master Record, they can be assigned to a particular catalog associated with a particular vendor. (SAP_0803520.) A particular catalog can be selected for searching by entering a CATALOGUE ID. (SAP_0803522-23.) The system may contain multiple CATALOGUE ID'S. (SAP_083522.)</p> <p><u>U.S. Patent No. 5,694,551</u> The master vendor catalog is assembled from information provided by individual vendors. (col. 8, ll. 47-60.) The customer initially selects the items to be available for searching using data files on vendor items. (col. 9, ll. 1-5.)</p> <p><u>U.S. Patent No. 5,712,989</u> The inventory database includes data describing items available at various Distributor warehouses</p>

'683 Patent Claim Element	Disclosure of this Element in the Prior Art (page, column and line references are illustrative only and not comprehensive)
	and for items from multiple vendors and third-party suppliers. (col. 3, ll. 18-21, 62-65; Fig. 1.) A code may be included that limits item searches to particular Distributor warehouses. (col. 22, ll. 36-47.)
searching for matching items among selected portions of the database;	<p><u>P.O. WRITER</u> The selected catalogs can be searched by ITEM NUMBER, ITEM DESCRIPTION, COMMODITY CODE, or a portion of these criteria. (SAP_0803523-24.)</p> <p><u>U.S. Patent No. 5,694,551</u> The customer catalog may be searched by product group or keyword. (col. 5, 26-27.)</p> <p><u>U.S. Patent No. 5,712,989</u> Items may be searched for by catalog or reference number from a third-party vendor. (col. 8, ll. 25-46.) A code may be included that limits item searches to particular Distributor warehouses. (col. 22, ll. 36-47.)</p>
building a requisition using data relating to selected matching items and their associated source(s);	<p><u>P.O. WRITER</u> Items from the catalog screen can be selected for requisition by pressing F7. (SAP_0803526.)</p> <p><u>U.S. Patent No. 5,694,551</u> Quantity item ordering data can be entered directly onto the catalog screen and linked to the requisition screen. (col. 5, ll. 26-37.)</p> <p><u>U.S. Patent No. 5,712,989</u> Items entered by catalog or reference number are added to a Requisition Item table. (col. 8, ll. 40-46.)</p>
processing the requisition to generate purchase orders using	<p><u>P.O. WRITER</u> A purchase order can be created from the requisition list by pressing F4. (SAP_0803528.)</p>

'683 Patent Claim Element	Disclosure of this Element in the Prior Art (page, column and line references are illustrative only and not comprehensive)
data relating to the selected matching items and their associated source(s); and	<p>Requisitions including items purchased from different vendors are split into different purchase orders by vendor. (SAP_0804199.)</p> <p><u>U.S. Patent No. 5,694,551</u> Requisitions are segregated by supplier and sent as purchase orders to appropriate internal suppliers and outside vendors. (Abstract; col. 4, ll. 4-17.)</p> <p><u>U.S. Patent No. 5,712,989</u> The Distributor will create an order for items it does not regularly stock. (col. 5, ll. 37-48; col. 10, l. 64 – col. 11, l. 8.) Multiple orders are generated depending on product type. (col. 11, ll. 37-47; col. 16 ll. 30-36.)</p>
converting data relating to a selected matching item and an associated source to data relating to an item and a different source.	<p><u>P.O. WRITER</u> During Purchase Order generation, the vendor listed on the requisition can be automatically converted to suggested vendors. (SAP_0804201-03.)</p> <p><u>U.S. Patent No. 5,712,989</u> The database may contain cross-references from Distributor's catalog number to its vendor's part number and to similar catalog numbers of other suppliers or distributors for the same Product, either as a part of the item record, in a separate cross-reference file or both. (col. 3, ll. 32-37.)</p>
42. The method of claim 41 wherein a first purchase order uses data relating to selected matching items from a first source and a second purchase order uses data relating to selected matching items from a second source.	<p><u>P.O. WRITER</u> Items from the catalog screen can be selected for requisition by pressing F7. (SAP_0803526.) Items from a second catalog can be selected for the same requisition by pressing CTRL+F5 to switch catalogs. (SAP_0803526.) A purchase order can be created from the requisition list by pressing F4. (SAP_0803528.) Requisitions including items purchased from different vendors are split into different purchase orders by vendor. (SAP_0804199.)</p> <p><u>U.S. Patent No. 5,694,551</u></p>

'683 Patent Claim Element	Disclosure of this Element in the Prior Art (page, column and line references are illustrative only and not comprehensive)
	<p>Requisitions are segregated by supplier and sent as purchase orders to appropriate internal suppliers and outside vendors. (Abstract; col. 4, ll. 4-17.)</p> <p><u>U.S. Patent No. 5,712,989</u> The Distributor will create an order for items it does not regularly stock. (col. 5, ll. 37-48; col. 10, l. 64 – col. 11, l. 8.) Multiple orders are generated depending on product type. (col. 11, ll. 37-47; col. 16 ll. 30-36.)</p>
<p>43. The method of claim 41 further comprising the step of determining whether a selected matching is available in inventory.</p>	<p><u>P.O. WRITER</u> An inventory Control Module allows you to track on-hand inventory balances. (SAP_0802953.)</p> <p><u>U.S. Patent No. 5,694,551</u> The requisition status information retrieves information on items in a particular requisition, including whether an item is backordered. (col. 5, ll. 42-48; Fig. 11.)</p> <p><u>U.S. Patent No. 5,712,989</u> A code may be included that limits item searches to particular Distributor warehouses and backordered if the item is not found. (col. 22, ll. 36-47.)</p>
<p>44. The method of claim 41 further comprising the step of determining the applicable price of a selected matching item.</p>	<p><u>P.O. WRITER</u> As items are added to the Item Master Record, they can be assigned a STANDARD COST. (SAP_0803303-04.)</p> <p><u>U.S. Patent No. 5,694,551</u> Information on price is provided in and may be obtained from the customer catalog. (col. 5, ll. 24-35; col. 7, 58-64; col. 8, 54-58; col. 9, ll. 8-10.)</p> <p><u>U.S. Patent No. 5,712,989</u> Each item record include Distributor's list price, discount codes, and vendor list price. (col. 3, ll.</p>

'683 Patent Claim Element	Disclosure of this Element in the Prior Art (page, column and line references are illustrative only and not comprehensive)
	24-26, 50-54.)
45. A method comprising the steps of:	
maintaining a database containing data relating to items associated with at least two vendors whereby selected portions of the database may be searched separately;	<p><u>P.O. WRITER</u> As items are added to the Item Master Record, they can be assigned to a particular catalog associated with a particular vendor. (SAP_0803520.) A particular catalog can be selected for searching by entering a CATALOGUE ID. (SAP_0803522-23.) The system may contain multiple CATALOGUE ID'S. (SAP_083522.) A particular catalog can be selected for searching by entering a CATALOGUE ID. (SAP_0803522-23.)</p> <p><u>U.S. Patent No. 5,694,551</u> The master vendor catalog is assembled from information provided by individual vendors. (col. 8, ll. 47-60.) The customer initially selects the items to be available for searching using data files on vendor items. (col. 9, ll. 1-5.)</p> <p><u>U.S. Patent No. 5,712,989</u> The inventory database includes data describing items available at various Distributor warehouses and for items from multiple vendors and third-party suppliers. (col. 3, ll. 18-21, 62-65; Fig. 1.) A code may be included that limits item searches to particular Distributor warehouses. (col. 22, ll. 36-47.)</p>
searching for matching items in the selected portions of the database;	<p><u>P.O. WRITER</u> The selected catalogs can be searched by ITEM NUMBER, ITEM DESCRIPTION, COMMODITY CODE, or a portion of these criteria. (SAP_0803523-24.)</p> <p><u>U.S. Patent No. 5,694,551</u> The customer catalog may be searched by product group or keyword. (col. 5, 26-27.)</p>

'683 Patent Claim Element	Disclosure of this Element in the Prior Art (page, column and line references are illustrative only and not comprehensive)
	<p><u>U.S. Patent No. 5,712,989</u> Items may be searched for by catalog or reference number from a third-party vendor. (col. 8, ll. 25-46.) A code may be included that limits item searches to particular Distributor warehouses. (col. 22, ll. 36-47.)</p>
building a requisition that includes selected matching items;	<p><u>P.O. WRITER</u> Items from the catalog screen can be selected for requisition by pressing F7. (SAP_0803526.)</p> <p><u>U.S. Patent No. 5,694,551</u> Quantity item ordering data can be entered directly onto the catalog screen and linked to the requisition screen. (col. 5, ll. 26-37.)</p> <p><u>U.S. Patent No. 5,712,989</u> Items entered by catalog or reference number are added to a Requisition Item table. (col. 8, ll. 40-46.)</p>
processing the requisition to generate purchase orders for selected matching items.	<p><u>P.O. WRITER</u> A purchase order can be created from the requisition list by pressing F4. (SAP_0803528.) Requisitions including items purchased from different vendors are split into different purchase orders by vendor. (SAP_0804199.)</p> <p><u>U.S. Patent No. 5,694,551</u> Requisitions are segregated by supplier and sent as purchase orders to appropriate internal suppliers and outside vendors. (Abstract; col. 4, ll. 4-17.)</p> <p><u>U.S. Patent No. 5,712,989</u> The Distributor will create an order for items it does not regularly stock. (col. 5, ll. 37-48; col. 10, l. 64 – col. 11, l. 8.) Multiple orders are generated depending on product type. (col. 11, ll.</p>

'683 Patent Claim Element	Disclosure of this Element in the Prior Art (page, column and line references are illustrative only and not comprehensive)
	37-47; col. 16 ll. 30-36.)

U.S. Patent 6,055,516

'516 Patent Claim Element	Disclosure of this Element in the Prior Art (page, column and line references are illustrative only and not comprehensive)
1. An electronic sourcing system comprising:	
a collection of catalogs of items stored in an electronic format;	<p><u>P.O. WRITER</u> As items are added to the Item Master Record, they can be assigned to a particular catalog associated with a particular vendor. (SAP_0803520.) A particular catalog can be selected for searching by entering a CATALOGUE ID. (SAP_0803522-23.) The system may contain multiple CATALOGUE ID'S. (SAP_083522.)</p> <p><u>U.S. Patent No. 5,694,551</u> The master vendor catalog is assembled from information provided by individual vendors. (col. 8, ll. 47-60.)</p> <p><u>U.S. Patent No. 5,712,989</u> The inventory database includes data describing items available at various Distributor warehouses and for items from multiple vendors and third-party suppliers. (col. 3, ll. 18-21, 62-65; Fig. 1.)</p>
a first set of pre-determined criteria associated with said collection of catalogs;	<p><u>P.O. WRITER</u> As items are added to the Item Master Record, they can be assigned to a particular catalog associated with a particular vendor. (SAP_0803520.)</p> <p><u>U.S. Patent No. 5,694,551</u> The customer initially selects the items to be available for searching using data files on vendor items. (col. 9, ll. 1-5.)</p>

'516 Patent Claim Element	Disclosure of this Element in the Prior Art (page, column and line references are illustrative only and not comprehensive)
	<u>U.S. Patent No. 5,712,989</u> A code may be included that limits item searches to particular Distributor warehouses. (col. 22, ll. 36-47.)
a second set of pre-determined criteria associated with items from each of said catalogs;	<u>P.O. WRITER</u> The selected catalogs can be searched by ITEM NUMBER, ITEM DESCRIPTION, COMMODITY CODE, or a portion of these criteria. (SAP_0803523-24.) <u>U.S. Patent No. 5,694,551</u> The customer catalog may be searched by product group or keyword. (col. 5, 26-27.) <u>U.S. Patent No. 5,712,989</u> Items may be searched for by catalog or reference number from a third-party vendor. (col. 8, ll. 25-29.)
a catalog selection protocol, said catalog selection protocol relying on said first set of pre-determined criteria to select less than said entire collection of catalogs,	<u>P.O. WRITER</u> A particular catalog can be selected for searching by entering a CATALOGUE ID. (SAP_0803522-23.) The system may contain multiple CATALOGUE ID'S. (SAP_083522.) <u>U.S. Patent No. 5,694,551</u> The customer initially selects the items to be available for searching using data files on vendor items. (col. 9, ll. 1-5.) <u>U.S. Patent No. 5,712,989</u> A code may be included that limits item searches to particular Distributor warehouses. (col. 22, ll. 36-47.)
and including matching a vendor identification code with	<u>P.O. WRITER</u> As items are added to the Item Master Record, they can be assigned to a particular catalog

'516 Patent Claim Element	Disclosure of this Element in the Prior Art (page, column and line references are illustrative only and not comprehensive)
a subset of said collection of catalogs,	associated with a particular vendor. (SAP_0803520.) A particular catalog can be selected for searching by entering a CATALOGUE ID. (SAP_0803522-23.) The system may contain multiple CATALOGUE ID'S. (SAP_083522.)
wherein said subset of catalogs includes both a vendor catalog from a predetermined vendor and a second catalog from a predetermined third party that is one of a manufacturer and a competing vendor, said predetermined third party selling items corresponding to items in said vendor catalog; and	<u>P.O. WRITER</u> A particular catalog can be selected for searching by entering a CATALOGUE ID. (SAP_0803522-23.) A second catalog may also be selected. (SAP_0803526.)
a search program, said search program relying on said second set of criteria to select specific items from said catalogs determined from said catalog selection protocol.	<u>P.O. WRITER</u> The selected catalogs can be searched by ITEM NUMBER, ITEM DESCRIPTION, COMMODITY CODE, or a portion of these criteria. (SAP_0803523-24.)
2. An electronic sourcing system as recited in claim 1, wherein catalogs comprising said collection of catalogs are stored in separate databases.	

'516 Patent Claim Element	Disclosure of this Element in the Prior Art (page, column and line references are illustrative only and not comprehensive)
3. An electronic sourcing system as recited in claim 1, wherein said catalogs comprising said collection of catalogs are stored in a single database.	<p><u>P.O. WRITER</u></p> <p>As items are added to the Item Master Record, they can be assigned to a particular catalog associated with a particular vendor. (SAP_0803520.) A particular catalog can be selected for searching by entering a CATALOGUE ID. (SAP_0803522-23.) The system may contain multiple CATALOGUE ID'S. (SAP_083522.)</p> <p><u>U.S. Patent No. 5,694,551</u></p> <p>The customer catalog may be searched by product group or keyword. (col. 5, 26-27.)</p> <p><u>U.S. Patent No. 5,712,989</u></p> <p>Items may be searched for by catalog or reference number from a third-party vendor. (col. 8, ll. 25-29.)</p>
4. An electronic sourcing system as recited in claim 1, wherein said predetermined third party makes items in said vendor catalog.	<p><u>P.O. WRITER</u></p> <p>As items are added to the Item Master Record, they can be assigned to a particular catalog associated with a particular vendor. (SAP_0803520.) A particular catalog can be selected for searching by entering a CATALOGUE ID. (SAP_0803522-23.) The system may contain multiple CATALOGUE ID'S. (SAP_083522.)</p> <p><u>U.S. Patent No. 5,712,989</u></p> <p>The database may contain cross-references from Distributor's catalog number to its vendor's part number and to similar catalog numbers of other suppliers or distributors for the same Product, either as a part of the item record, in a separate cross-reference file or both. (col. 3, ll. 32-37.)</p>
5. An electronic sourcing system as recited in claim 1, further including a cross reference table linking a vendor item catalog number from said	<p><u>U.S. Patent No. 5,712,989</u></p> <p>The database may contain cross-references from Distributor's catalog number to its vendor's part number and to similar catalog numbers of other suppliers or distributors for the same Product, either as a part of the item record, in a separate cross-reference file or both. (col. 3, ll. 32-37.)</p>

'516 Patent Claim Element	Disclosure of this Element in the Prior Art (page, column and line references are illustrative only and not comprehensive)
vendor with an item catalog number from said predetermined third party.	
6. An electronic sourcing system as recited in claim 1, wherein said second set of predetermined criteria includes at least one of a catalog number and item textual information.	<u>P.O. WRITER</u> The selected catalogs can be searched by ITEM NUMBER, ITEM DESCRIPTION, COMMODITY CODE, or a portion of these criteria. (SAP_0803523-24.)
7. An electronic sourcing system as recited in claim 1, wherein said catalog selection protocol includes providing an electronic listing of available catalogs from said collection of catalogs.	<u>P.O. WRITER</u> Pressing SHIFT+F4 displays a list of valid CATALOGUE ID'S. (SAP_0803522.)
8. An electronic sourcing system as recited in claim 7, wherein said electronic listing of available catalogs is less than said collection of catalogs.	<u>P.O. WRITER</u> A particular catalog can be selected for searching by entering a CATALOGUE ID. (SAP_0803522-23.) A second catalog may also be selected. (SAP_0803526.)
9. An electronic sourcing system comprising:	
a collection of catalog items	<u>P.O. WRITER</u>

'516 Patent Claim Element	Disclosure of this Element in the Prior Art (page, column and line references are illustrative only and not comprehensive)
stored in an electronic format;	<p>As items are added to the Item Master Record, they can be assigned to a particular catalog associated with a particular vendor. (SAP_0803520.) A particular catalog can be selected for searching by entering a CATALOGUE ID. (SAP_0803522-23.) The system may contain multiple CATALOGUE ID'S. (SAP_083522.)</p> <p><u>U.S. Patent No. 5,694,551</u> The master vendor catalog is assembled from information provided by individual vendors. (col. 8, ll. 47-60.)</p> <p><u>U.S. Patent No. 5,712,989</u> The inventory database includes data describing items available at various Distributor warehouses and for items from multiple vendors and third-party suppliers. (col. 3, ll. 18-21, 62-65; Fig. 1.)</p>
a first identification code associated with a first item in a first catalog;	<p><u>P.O. WRITER</u> Items from the catalog screen can be selected for requisition by pressing F7. (SAP_0803526.) Items from a second catalog can be selected for the same requisition by pressing CTRL+F5 to switch catalogs. (SAP_0803526.)</p>
a second identification code associated with a second item in a second catalog, said first item and said second item being generally equivalent, and	<p><u>P.O. WRITER</u> Items from the catalog screen can be selected for requisition by pressing F7. (SAP_0803526.) Items from a second catalog can be selected for the same requisition by pressing CTRL+F5 to switch catalogs. (SAP_0803526.)</p>
wherein a selection of one identification code from one of said first and second catalogs provides the other identification code from the	<p><u>U.S. Patent No. 5,712,989</u> The database may contain cross-references from Distributor's catalog number to its vendor's part number and to similar catalog numbers of other suppliers or distributors for the same Product, either as a part of the item record, in a separate cross-reference file or both. (col. 3, ll. 32-37.)</p>

'516 Patent Claim Element	Disclosure of this Element in the Prior Art (page, column and line references are illustrative only and not comprehensive)
other of said catalogs.	
10. An electronic sourcing system as recited in claim 9, wherein said first identification code is identical to said second identification code.	
11. An electronic sourcing system as recited in claim 9, wherein at least one of said first and second catalogs includes said first and second identification codes.	
12. An electronic sourcing system as recited in claim 9, wherein said selection includes a comparison of said one of said first and second identification codes with a cross-reference table listing both of said identification codes as being generally equivalent.	<u>U.S. Patent No. 5,712,989</u> The database may contain cross-references from Distributor's catalog number to its vendor's part number and to similar catalog numbers of other suppliers or distributors for the same Product, either as a part of the item record, in a separate cross-reference file or both. (col. 3, ll. 32-37.)
13. An electronic sourcing system as recited in claim 9, wherein a user selects one of	

'516 Patent Claim Element	Disclosure of this Element in the Prior Art (page, column and line references are illustrative only and not comprehensive)
said first and second identification codes, lacks access to said catalog corresponding said selected identification code, but is given access to the other said catalog corresponding to said non-selected identification code.	
14. An electronic sourcing system as recited in claim 9, wherein a user selects one of said first and second identification codes, and has access to both said first and second catalogs.	
15. An electronic sourcing system as recited in claim 9, wherein said first and second identification codes correspond to a part number.	
16. An electronic sourcing system comprising:	
at least two product catalogs containing data relating to items such that an item in a	<u>P.O. WRITER</u> As items are added to the Item Master Record, they can be assigned to a particular catalog associated with a particular vendor. (SAP_0803520.) A particular catalog can be selected for

'516 Patent Claim Element	Disclosure of this Element in the Prior Art (page, column and line references are illustrative only and not comprehensive)
first catalog is generally equivalent with an item in a second catalog; and	<p>searching by entering a CATALOGUE ID. (SAP_0803522-23.) The system may contain multiple CATALOGUE ID'S. (SAP_083522.)</p> <p><u>U.S. Patent No. 5,694,551</u> The master vendor catalog is assembled from information provided by individual vendors. (col. 8, ll. 47-60.)</p> <p><u>U.S. Patent No. 5,712,989</u> The inventory database includes data describing items available at various Distributor warehouses and for items from multiple vendors and third-party suppliers. (col. 3, ll. 18-21, 62-65; Fig. 1.)</p>
converting means for converting data relating to said item from said first catalog to data relating to said item from said second catalog.	<p><u>P.O. WRITER</u> During Purchase Order generation, the vendor listed on the requisition can be automatically converted to suggested vendors. (SAP_0804201-03.)</p> <p><u>U.S. Patent No. 5,712,989</u> The database may contain cross-references from Distributor's catalog number to its vendor's part number and to similar catalog numbers of other suppliers or distributors for the same Product, either as a part of the item record, in a separate cross-reference file or both. (col. 3, ll. 32-37.)</p>
17. An electronic sourcing system as recited in claim 16, wherein at least one catalog database contains said data from each of said catalogs, and said converting means includes a non-catalog database containing a cross-reference table such that used of a	<p><u>U.S. Patent No. 5,712,989</u> The database may contain cross-references from Distributor's catalog number to its vendor's part number and to similar catalog numbers of other suppliers or distributors for the same Product, either as a part of the item record, in a separate cross-reference file or both. (col. 3, ll. 32-37.)</p>

'516 Patent Claim Element	Disclosure of this Element in the Prior Art (page, column and line references are illustrative only and not comprehensive)
reference corresponds to an entry in said cross-reference table links said item from said first catalog to data relating to said item from said second catalog.	
18. An electronic sourcing system as recited in claim 16, wherein one or more catalog databases contain data from each of said catalogs, and said converting means including one of more catalog databases including an identical reference code corresponding to said data from said first catalog and said data from said second catalog.	<u>U.S. Patent No. 5,712,989</u> The database may contain cross-references from Distributor's catalog number to its vendor's part number and to similar catalog numbers of other suppliers or distributors for the same Product, either as a part of the item record, in a separate cross-reference file or both. (col. 3, ll. 32-37.)
19. An electronic sourcing system as recited in claim 16, wherein said first catalog may be searched separately from said second catalog.	<u>P.O. WRITER</u> A particular catalog can be selected for searching by entering a CATALOGUE ID. (SAP_0803522-23.) The selected catalogs can be searched by ITEM NUMBER, ITEM DESCRIPTION, COMMODITY CODE, or a portion of these criteria. (SAP_0803523-24.) A second catalog may be separately searched. (SAP_0803526.)
20. An electronic sourcing system as recited in claim 16, wherein a user lack access to said first catalog and has access	

'516 Patent Claim Element	Disclosure of this Element in the Prior Art (page, column and line references are illustrative only and not comprehensive)
to said second catalog, such that a request for an item in said first catalog provides said data from said second catalog.	
21. An electronic sourcing system comprising:	
a requisition module including data fields, user-generated criteria entered into at least one of said data fields to generate at least partial criteria corresponding to a desired item;	<p><u>P.O. WRITER</u> Items can be searched for by ITEM NUMBER, ITEM DESCRIPTION, COMMODITY CODE, or a portion of these criteria. (SAP_0803523-24.)</p>
a catalog collection searching module, said searching module including a collection of catalogs of items stored in an electronic format, a catalog selection criteria used to select less than said entire collection,	<p><u>P.O. WRITER</u> As items are added to the Item Master Record, they can be assigned to a particular catalog associated with a particular vendor. (SAP_0803520.) A particular catalog can be selected for searching by entering a CATALOGUE ID. (SAP_0803522-23.) The system may contain multiple CATALOGUE ID'S. (SAP_083522.)</p> <p><u>U.S. Patent No. 5,694,551</u> The master vendor catalog is assembled from information provided by individual vendors. (col. 8, ll. 47-60.)</p> <p><u>U.S. Patent No. 5,712,989</u> The inventory database includes data describing items available at various Distributor warehouses and for items from multiple vendors and third-party suppliers. (col. 3, ll. 18-21, 62-65; Fig. 1.)</p>

'516 Patent Claim Element	Disclosure of this Element in the Prior Art (page, column and line references are illustrative only and not comprehensive)
said searching module being used to generate additional search-module criteria for said data fields of said requisition module;	<u>P.O. WRITER</u> The list populated as a result of searching for items by ITEM NUMBER, ITEM DESCRIPTION, COMMODITY CODE, or a portion of these criteria, includes the ITEM NUMBER, a DESCRIPTION-1, a DESCRIPTION-2, and a COMMODITY CODE. (SAP_0803524.)
a multiple purchase order generation module, said purchase order generation module creating multiple purchase orders from a single requisition created with said user-generated criteria and said search-module criteria;	<u>P.O. WRITER</u> A purchase order can be created from the requisition list by pressing F4. (SAP_0803528.) Requisitions including items purchased from different vendors are split into different purchase orders by vendor. (SAP_0804199.)
wherein each of at least two catalogs include a generally equivalent item from a different source, said requisition module working in combination with said catalog searching module to determine multiple sources for said item;	<u>U.S. Patent No. 5,712,989</u> The database may contain cross-references from Distributor's catalog number to its vendor's part number and to similar catalog numbers of other suppliers or distributors for the same Product, either as a part of the item record, in a separate cross-reference file or both. (col. 3, ll. 32-37.)
wherein said multiple sources is limited by said catalog searching module providing a match according to said user-generated criteria, said search-	

'516 Patent Claim Element	Disclosure of this Element in the Prior Art (page, column and line references are illustrative only and not comprehensive)
module criteria and a determination system that located items are generally equivalent; and	
wherein said determination system includes a cross reference table matching an identification code from a first located item with a second identification code from a second located item.	<u>U.S. Patent No. 5,712,989</u> The database may contain cross-references from Distributor's catalog number to its vendor's part number and to similar catalog numbers of other suppliers or distributors for the same Product, either as a part of the item record, in a separate cross-reference file or both. (col. 3, ll. 32-37.)
22. An electronic sourcing system as recited in claim 21, wherein said determination system includes an identical identification code for each of said located items.	
23. An electronic sourcing system as recited in claim 21, wherein said requisition module generates a preferred requisition based on at least one of product availability and user preferences in accordance with a determination of multiple sources for a desired	<u>P.O. WRITER</u> The vendor listed on the requisition can be automatically converted to suggested vendors. (SAP_0804201-03.)

'516 Patent Claim Element	Disclosure of this Element in the Prior Art (page, column and line references are illustrative only and not comprehensive)
item	
24. An electronic sourcing system as recited in claim 21, wherein less than said catalog selection criteria is determined by at least one of said user-generated criteria or user characteristics.	<p><u>P.O. WRITER</u></p> <p>As items are added to the Item Master Record, they can be assigned to a particular catalog associated with a particular vendor. (SAP_0803520.) A particular catalog can be selected for searching by entering a CATALOGUE ID. (SAP_0803522-23.) The system may contain multiple CATALOGUE ID'S. (SAP_083522.)</p>
25. An electronic sourcing system as recited in claim 24, wherein said user characteristics include a listing of catalogs from which a user is allowed to purchase.	<p><u>P.O. WRITER</u></p> <p>As items are added to the Item Master Record, they can be assigned to a particular catalog associated with a particular vendor. (SAP_0803520.) A particular catalog can be selected for searching by entering a CATALOGUE ID. (SAP_0803522-23.) The system may contain multiple CATALOGUE ID'S. (SAP_083522.) Pressing SHIFT+F4 displays a list of valid CATALOGUE ID'S. (SAP_0803522.)</p>
26. An electronic sourcing system as recited in claim 21, wherein said requisition modules uses at least one pre-determined rule to select which of multiple sources to use for said desired item.	<p><u>P.O. WRITER</u></p> <p>As items are added to the Item Master Record, they can be assigned to a particular catalog associated with a particular vendor. (SAP_0803520.) A particular catalog can be selected for searching by entering a CATALOGUE ID. (SAP_0803522-23.) The system may contain multiple CATALOGUE ID'S. (SAP_083522.)</p>
27. An electronic sourcing system as recited in claim 26, wherein said pre-determined rule relies on item availability.	

'516 Patent Claim Element	Disclosure of this Element in the Prior Art (page, column and line references are illustrative only and not comprehensive)
28. An electronic sourcing system as recited in claim 26, wherein said pre-determined rule relies on a hierarchy of preferred sources.	
29. An electronic sourcing system comprising:	
a collection of catalogs of items stored in an electronic format;	<p><u>P.O. WRITER</u> As items are added to the Item Master Record, they can be assigned to a particular catalog associated with a particular vendor. (SAP_0803520.) A particular catalog can be selected for searching by entering a CATALOGUE ID. (SAP_0803522-23.) The system may contain multiple CATALOGUE ID'S. (SAP_083522.)</p> <p><u>U.S. Patent No. 5,694,551</u> The master vendor catalog is assembled from information provided by individual vendors. (col. 8, ll. 47-60.)</p> <p><u>U.S. Patent No. 5,712,989</u> The inventory database includes data describing items available at various Distributor warehouses and for items from multiple vendors and third-party suppliers. (col. 3, ll. 18-21, 62-65; Fig. 1.)</p>
a first set of pre-determined criteria associated with said collection of catalogs;	<p><u>P.O. WRITER</u> As items are added to the Item Master Record, they can be assigned to a particular catalog associated with a particular vendor. (SAP_0803520.)</p> <p><u>U.S. Patent No. 5,694,551</u></p>

'516 Patent Claim Element	Disclosure of this Element in the Prior Art (page, column and line references are illustrative only and not comprehensive)
	<p>The customer initially selects the items to be available for searching using data files on vendor items. (col. 9, ll. 1-5.)</p> <p><u>U.S. Patent No. 5,712,989</u> A code may be included that limits item searches to particular Distributor warehouses. (col. 22, ll. 36-47.)</p>
a second set of predetermined criteria associated with items from each of said catalogs;	<p><u>P.O. WRITER</u> The selected catalogs can be searched by ITEM NUMBER, ITEM DESCRIPTION, COMMODITY CODE, or a portion of these criteria. (SAP_0803523-24.)</p> <p><u>U.S. Patent No. 5,694,551</u> The customer catalog may be searched by product group or keyword. (col. 5, 26-27.)</p> <p><u>U.S. Patent No. 5,712,989</u> Items may be searched for by catalog or reference number from a third-party vendor. (col. 8, ll. 25-46.) A code may be included that limits item searches to particular Distributor warehouses. (col. 22, ll. 36-47.)</p>
a catalog selection protocol, said catalog selection protocol relying on said first set of predetermined criteria to select less than said entire collection of catalogs,	<p><u>P.O. WRITER</u> A particular catalog can be selected for searching by entering a CATALOGUE ID. (SAP_0803522-23.) The system may contain multiple CATALOGUE ID'S. (SAP_083522.)</p> <p><u>U.S. Patent No. 5,694,551</u> The customer initially selects the items to be available for searching using data files on vendor items. (col. 9, ll. 1-5.)</p> <p><u>U.S. Patent No. 5,712,989</u> A code may be included that limits item searches to particular Distributor warehouses. (col. 22,</p>

'516 Patent Claim Element	Disclosure of this Element in the Prior Art (page, column and line references are illustrative only and not comprehensive)
	ll. 36-47.)
and including matching a vendor identification code with a subset of said collection of catalogs,	<u>P.O. WRITER</u> A particular catalog can be selected for searching by entering a CATALOGUE ID. (SAP_0803522-23.) The system may contain multiple CATALOGUE ID'S. (SAP_083522.)
wherein said subset of catalogs includes both a vendor catalog from a predetermined vendor and a second catalog from a predetermined third party;	<u>P.O. WRITER</u> A particular catalog can be selected for searching by entering a CATALOGUE ID. (SAP_0803522-23.) A second catalog may also be selected. (SAP_0803526.)
a search program, said search program relying on said second set of criteria to select specific items from said catalogs determined from said catalog selection protocol; and	<u>P.O. WRITER</u> The selected catalogs can be searched by ITEM NUMBER, ITEM DESCRIPTION, COMMODITY CODE, or a portion of these criteria. (SAP_0803523-24.) <u>U.S. Patent No. 5,694,551</u> The customer catalog may be searched by product group or keyword. (col. 5, 26-27.) <u>U.S. Patent No. 5,712,989</u> Items may be searched for by catalog or reference number from a third-party vendor. (col. 8, ll. 25-46.) A code may be included that limits item searches to particular Distributor warehouses. (col. 22, ll. 36-47.)
a cross-reference table linking a vendor item catalog number from said vendor catalog with an item catalog number from said predetermined third party.	<u>U.S. Patent No. 5,712,989</u> The database may contain cross-references from Distributor's catalog number to its vendor's part number and to similar catalog numbers of other suppliers or distributors for the same Product, either as a part of the item record, in a separate cross-reference file or both. (col. 3, ll. 32-37.)

'516 Patent Claim Element	Disclosure of this Element in the Prior Art (page, column and line references are illustrative only and not comprehensive)

U.S. Patent No. 6,505,172

'172 Patent Claim Element	Disclosure of this Element in the Prior Art (page, column and line references are illustrative only and not comprehensive)
1. An electronic sourcing system comprising:	
a database containing data relating to items associated with at least two vendors maintained so that selected portions of the database may be searched separately;	<p><u>P.O. WRITER</u> As items are added to the Item Master Record, they can be assigned to a particular catalog associated with a particular vendor. (SAP_0803520.) A particular catalog can be selected for searching by entering a CATALOGUE ID. (SAP_0803522-23.) The system may contain multiple CATALOGUE ID'S. (SAP_083522.) A particular catalog can be selected for searching by entering a CATALOGUE ID. (SAP_0803522-23.)</p> <p><u>U.S. Patent No. 5,694,551</u> The master vendor catalog is assembled from information provided by individual vendors. (col. 8, ll. 47-60.)</p> <p><u>U.S. Patent No. 5,712,989</u> The inventory database includes data describing items available at various Distributor warehouses and for items from multiple vendors and third-party suppliers. (col. 3, ll. 18-21, 62-65; Fig. 1.)</p>
means for entering product information that at least partially describes at least one desired item;	<p><u>P.O. WRITER</u> The selected catalogs can be searched by ITEM NUMBER, ITEM DESCRIPTION, COMMODITY CODE, or a portion of these criteria. (SAP_0803523-24.)</p> <p><u>U.S. Patent No. 5,694,551</u> The customer initially selects the items to be available for searching using data files on vendor items. (col. 9, ll. 1-5.)</p>

'172 Patent Claim Element	Disclosure of this Element in the Prior Art (page, column and line references are illustrative only and not comprehensive)
	<p><u>U.S. Patent No. 5,712,989</u> A code may be included that limits item searches to particular Distributor warehouses. (col. 22, ll. 36-47.)</p>
means for searching for matching items that match the entered product information in the selected portions of the database;	<p><u>P.O. WRITER</u> The selected catalogs can be searched by ITEM NUMBER, ITEM DESCRIPTION, COMMODITY CODE, or a portion of these criteria. (SAP_0803523-24.)</p> <p><u>U.S. Patent No. 5,694,551</u> The customer initially selects the items to be available for searching using data files on vendor items. (col. 9, ll. 1-5.)</p> <p><u>U.S. Patent No. 5,712,989</u> A code may be included that limits item searches to particular Distributor warehouses. (col. 22, ll. 36-47.)</p>
means for generating an order list that includes at least one matching item selected by said means for searching;	<p><u>P.O. WRITER</u> Items from the catalog screen can be selected for requisition by pressing F7. (SAP_0803526.)</p> <p><u>U.S. Patent No. 5,694,551</u> Quantity item ordering data can be entered directly onto the catalog screen and linked to the requisition screen. (col. 5, ll. 26-37.)</p> <p><u>U.S. Patent No. 5,712,989</u> Items entered by catalog or reference number are added to a Requisition Item table. (col. 8, ll. 40-46.)</p>
means for building a requisition that uses data	<p><u>P.O. WRITER</u> Items from the catalog screen can be selected for requisition by pressing F7. (SAP_0803526.)</p>

'172 Patent Claim Element	Disclosure of this Element in the Prior Art (page, column and line references are illustrative only and not comprehensive)
obtained from said database relating to selected matching items on said order list;	<p><u>U.S. Patent No. 5,694,551</u> Quantity item ordering data can be entered directly onto the catalog screen and linked to the requisition screen. (col. 5, ll. 26-37.)</p> <p><u>U.S. Patent No. 5,712,989</u> Items entered by catalog or reference number are added to a Requisition Item table. (col. 8, ll. 40-46.)</p>
means for processing said requisition to generate purchase orders for said selected matching items.	<p><u>P.O. WRITER</u> A purchase order can be created from the requisition list by pressing F4. (SAP_0803528.) Requisitions including items purchased from different vendors are split into different purchase orders by vendor. (SAP_0804199.)</p> <p><u>U.S. Patent No. 5,694,551</u> Requisitions are segregated by supplier and sent as purchase orders to appropriate internal suppliers and outside vendors. (Abstract; col. 4, ll. 4-17.)</p> <p><u>U.S. Patent No. 5,712,989</u> The Distributor will create an order for items it does not regularly stock. (col. 5, ll. 37-48; col. 10, l. 64 – col. 11, l. 8.) Multiple orders are generated depending on product type. (col. 11, ll. 37-47; col. 16 ll. 30-36.) The database may contain cross-references from Distributor's catalog number to its vendor's part number and to similar catalog numbers of other suppliers or distributors for the same Product, either as a part of the item record, in a separate cross-reference file or both. (col. 3, ll. 32-37.)</p>
2. The electronic sourcing system according to claim 1, wherein the means for	

'172 Patent Claim Element	Disclosure of this Element in the Prior Art (page, column and line references are illustrative only and not comprehensive)
searching comprises:	
means for searching the database for segments of data relating to items associated with a vendor that contain vendor items that match the product information for said at least one desired item;	<p><u>P.O. WRITER</u> The selected catalogs can be searched by ITEM NUMBER, ITEM DESCRIPTION, COMMODITY CODE, or a portion of these criteria. (SAP_0803523-24.)</p> <p><u>U.S. Patent No. 5,694,551</u> The customer initially selects the items to be available for searching using data files on vendor items. (col. 9, ll. 1-5.)</p> <p><u>U.S. Patent No. 5,712,989</u> A code may be included that limits item searches to particular Distributor warehouses. (col. 22, ll. 36-47.)</p>
means for generating a hit list of such vendor segments; and	<p><u>P.O. WRITER</u> The system sorts and displays all items that match the portion of the criteria entered. (SAP_0803524.)</p> <p><u>U.S. Patent No. 5,694,551</u> Quantity item ordering data can be entered directly onto the catalog screen and linked to the requisition screen. (col. 5, ll. 26-37.)</p> <p><u>U.S. Patent No. 5,712,989</u> Items entered by catalog or reference number are added to a Requisition Item table. (col. 8, ll. 40-46.)</p>
means for selectively viewing the vendor segments identified for said hit list; and	<p><u>P.O. WRITER</u> The system sorts and displays all items that match the portion of the criteria entered. (SAP_0803524.)</p>

'172 Patent Claim Element	Disclosure of this Element in the Prior Art (page, column and line references are illustrative only and not comprehensive)
	<p><u>U.S. Patent No. 5,694,551</u> Quantity item ordering data can be entered directly onto the catalog screen and linked to the requisition screen. (col. 5, ll. 26-37.)</p> <p><u>U.S. Patent No. 5,712,989</u> Items entered by catalog or reference number are added to a Requisition Item table. (col. 8, ll. 40-46.)</p>
<p>wherein the means for generating an order list comprises means for selecting desired items from a vendor segment identified by said hit list.</p>	<p><u>P.O. WRITER</u> Items from the catalog screen can be selected for requisition by pressing F7. (SAP_0803526.)</p> <p><u>U.S. Patent No. 5,694,551</u> Requisitions are segregated by supplier and sent as purchase orders to appropriate internal suppliers and outside vendors. (Abstract; col. 4, ll. 4-17.)</p> <p><u>U.S. Patent No. 5,712,989</u> The Distributor will create an order for items it does not regularly stock. (col. 5, ll. 37-48; col. 10, l. 64 – col. 11, l. 8.) Multiple orders are generated depending on product type. (col. 11, ll. 37-47; col. 16 ll. 30-36.)</p>
<p>3. The electronic sourcing system according to claim 1, wherein the means for entering product information fully describes at least one desired item.</p>	<p><u>P.O. WRITER</u> The selected catalogs can be searched by ITEM NUMBER, ITEM DESCRIPTION, COMMODITY CODE, or a portion of these criteria. (SAP_0803523-24.)</p> <p><u>U.S. Patent No. 5,694,551</u> The customer initially selects the items to be available for searching using data files on vendor items. (col. 9, ll. 1-5.)</p>

'172 Patent Claim Element	Disclosure of this Element in the Prior Art (page, column and line references are illustrative only and not comprehensive)
	<p><u>U.S. Patent No. 5,712,989</u> A code may be included that limits item searches to particular Distributor warehouses. (col. 22, ll. 36-47.)</p>
4. The electronic sourcing system according to claim 1, further comprising means for determining the applicable price of a selected matching item.	<p><u>P.O. WRITER</u> As items are added to the Item Master Record, they can be assigned a STANDARD COST. (SAP_0803303-04.)</p> <p><u>U.S. Patent No. 5,694,551</u> Information on price is provided in and may be obtained from the customer catalog. (col. 5, ll. 24-35; col. 7, 58-64; col. 8, 54-58; col. 9, ll. 8-10.)</p> <p><u>U.S. Patent No. 5,712,989</u> Each item record include Distributor's list price, discount codes, and vendor list price. (col. 3, ll. 24-26, 50-54.)</p>
5. The electronic sourcing system according to claim 1, further comprising means for determining whether a selected matching item is available in inventory.	<p><u>P.O. WRITER</u> An inventory Control Module allows you to track on-hand inventory balances. (SAP_0802953.)</p> <p><u>U.S. Patent No. 5,694,551</u> The requisition status information retrieves information on items in a particular requisition, including whether an item is backordered. (col. 5, ll. 42-48; Fig. 11.)</p> <p><u>U.S. Patent No. 5,712,989</u> A code may be included that limits item searches to particular Distributor warehouses and backordered if the item is not found. (col. 22, ll. 36-47.)</p>

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Norfolk Division**

ePLUS, INC.,

Plaintiff,

v.

PERFECT COMMERCE, INC.,
SCIQUEST, INC., LAWSON
SOFTWARE, INC. AND VERIAN
TECHNOLOGIES, INC.,

Defendants.

Civil Action No. 2:09cv232

CERTIFICATE OF SERVICE

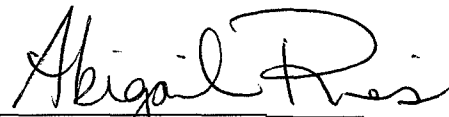
I hereby certify that on September 18, 2009, I caused the following documents:

1. Defendant Lawson Software, Inc.'s Supplemental Responses to Plaintiff ePlus Inc.'s Interrogatory Nos. 2, 4, and 10; and
2. Certificate of Service.

to be served on the following individuals via electronic mail:

Goodwin Procter ePlus team at ePlusGoodwinService@goodwinprocter.com
Gregory N. Stillman at gstillman@hunton.com
Brent L. VanNorman at bvannorman@hunton.com

Dated: September 18, 2009


Abigail Ries